

Exhibit 10

Minnesota

Exhibit 10A

Meta's Proposal[s]

MDL 3047 – December 20, 2024
Minnesota – Meta Proposal

Search Terms: Meta made its most recent counterproposals to the Minnesota Department of Human Services and to the Department of Education on December 18 and December 20, 2024, respectively.

Counterproposal Provided to Minnesota Department of Human Services

At a high level, Meta’s proposal involves using search combinations that require “Social Media Terms,” “Harm Terms,” or “Other Case Issue Terms” to occur “within 150” of one of the following “Youth Terms”:

(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen-a* OR student* OR pupil*)

#	Search Set 1 – Youth Use of Social Media
1.	(“social media” OR “social network” OR Meta OR Facebook OR Instagram OR “Insta” OR Youtube OR Snapchat OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest OR Tumblr OR viber OR threema OR wechat OR kik OR textplus OR wickr OR YikYak OR “Yik Yak” OR finsta OR FB OR IG OR YT OR TT OR DM* OR “direct message”) w/150 “Youth Terms”
	Search Set 2 – Youth Mental Health / Wellbeing Issues
2.	(wellness OR wellbeing OR well-being OR confidence OR self-confidence OR “mental health” OR “TMH” OR anxi* OR anti-anxi* OR depress* OR antidepress* OR reclus* OR “attention deficit” OR “ADHD” OR posttraumatic OR “bi-polar” OR “bi polar” OR bipolar OR “BPD” OR insomnia therap* OR counsel*) w/150 “Youth Terms”
3.	(“pro-ana” OR “BMI” OR obes* OR anorexi* OR bulimi* OR orthorexi* OR dysmorph* OR binge OR purge OR suicid* OR “self harm” OR “self-harm” OR selfharm OR unalive OR cutting*) w/150 “Youth Terms”
4.	(bully* OR bullie* OR cyberbull* OR harass* OR sextort* OR transphob* OR homophob* OR racis* OR sexis* OR groom* OR hookup* OR solicit* OR pedophil* OR predator* OR extort OR exploit*) w/150 “Youth Terms”
5.	(violen* OR abus* OR assault* OR shoot* OR shot OR threat* OR gun* OR pistol OR rifle OR firearm OR rape* OR murder* OR traff* OR hate*) w/150 “Youth Terms”
6.	(addic* OR hook* OR dopamine OR rabbithol* OR spiral OR “social reward” OR “social approval” OR “screen time” OR screentime OR staytime OR timespent OR “time spent” OR “engagement” OR impression* OR “monthly active users” OR “daily active users” OR “monthly active people” OR “daily active people” OR “weekly active users” OR

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	“mandatory break” OR “limiting tool” OR “habit loop” OR “operant conditioning” OR “impulse control”) w/150 “Youth Terms”
7.	(eat* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*)) w/150 “Youth Terms”
8.	(sleep* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*)) w/150 “Youth Terms”
9.	(negative w/3 (appearance OR experience OR affect* OR effect*)) w/150 “Youth Terms”
10.	(compar* w/5 (appearance OR social OR other* OR negative)) w/150 “Youth Terms”
11.	(body w/3 (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*)) w/150 “Youth Terms”
12.	(self w/3 (esteem OR harm OR control OR injur* OR mutilat* OR regulat*)) w/150 “Youth Terms”
13.	(Covid* OR coronavirus OR pandemic OR lockdown OR “lock* down” OR quarantine OR “social* distanc”) w/150 “Youth Terms”
14.	(svap* OR “ecig” OR “e-cig” OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent* OR opio* OR opia* OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller* OR narcotic* OR drug* OR alcohol* OR Juul) w/150 “Youth Terms”
15.	“ACE” OR “ACEs” OR “adverse childhood experience” OR “adverse childhood experiences”
Search Set 3 – Other Case Issues	
16.	(legislation OR advocacy OR lobby* OR legislat* OR revok* OR fine* OR sanction* OR cancel* OR abandon* OR ban OR banned OR banning OR concern* OR problematic OR investigat* OR criminal OR charges OR conviction* OR arrest* OR “law enforcement” OR deceptive OR decei* OR fraud* OR defraud* OR cheat* OR misrepresent* OR mislead* OR schem* OR exploit* OR trick* OR conceal* OR hide OR omit* OR downplay* OR suppress* OR “cover up” OR “Consumer Protection Act” OR “consumer protection”) w/25 (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen-a* OR scholar* OR School* OR student* OR pupil* OR grade*)

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Counterproposal Provided to Minnesota Department of Education

At a high level, Meta’s proposal involves using search combinations that require “Social Media Terms,” “Harm Terms,” or “Other Case Issue Terms” to occur “within 50” of one of the following “Youth Terms”:

(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen-a* OR student* OR pupil*)

#	Search Set 1 – Youth Use of Social Media
1.	(“social media” OR “social network” OR Meta OR Facebook OR Instagram OR “Insta” OR Youtube OR Snapchat OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest OR Tumblr OR viber OR threema OR wechat OR kik OR textplus OR wickr OR YikYak OR “Yik Yak” OR finsta OR FB OR IG OR YT OR TT OR DM* OR “direct message”) w/50 “Youth Terms”
	Search Set 2 – Youth Mental Health / Wellbeing Issues
2.	(wellness OR wellbeing OR well-being OR confidence OR self-confidence OR “mental health” OR “TMH” OR anxi* OR anti-anxi* OR depress* OR antidepress* OR reclus* OR “attention deficit” OR “ADHD” OR posttraumatic OR “bi-polar” OR “bi polar” OR bipolar OR “BPD” OR insomnia therap* OR counsel*) w/50 “Youth Terms”
3.	(“pro-ana” OR “BMI” OR obes* OR anorexi* OR bulimi* OR orthorexi* OR dysmorph* OR binge OR purge OR suicid* OR “self harm” OR “self-harm” OR selfharm OR unalive OR cutting*) w/50 “Youth Terms”
4.	(bully* OR bullie* OR cyberbull* OR harass* OR sextort* OR transphob* OR homophob* OR racis* OR sexis* OR groom* OR hookup* OR solicit* OR pedophil* OR predator* OR extort OR exploit*) w/50 “Youth Terms”
5.	(violen* OR abus* OR assault* OR shoot* OR shot OR threat* OR gun* OR pistol OR rifle OR firearm OR rape* OR murder* OR traff* OR hate*) w/50 “Youth Terms”
6.	(addic* OR hook* OR dopamine OR rabbithol* OR spiral OR “social reward” OR “social approval” OR “screen time” OR screentime OR staytime OR timespent OR “time spent” OR “engagement” OR impression* OR “monthly active users” OR “daily active users” OR “monthly active people” OR “daily active people” OR “weekly active users” OR “mandatory break” OR “limiting tool” OR “habit loop” OR “operant conditioning” OR “impulse control”) w/50 “Youth Terms”

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7.	(eat* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*)) w/50 “Youth Terms”
8.	(sleep* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*)) w/50 “Youth Terms”
9.	(negative w/3 (appearance OR experience OR affect* OR effect*)) w/50 “Youth Terms”
10.	(compar* w/5 (appearance OR social OR other* OR negative)) w/50 “Youth Terms”
11.	(body w/3 (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*)) w/50 “Youth Terms”
12.	(self w/3 (esteem OR harm OR control OR injur* OR mutilat* OR regulat*)) w/50 “Youth Terms”
13.	(Covid* OR coronavirus OR pandemic OR lockdown OR “lock* down” OR quarantine OR “social* distanc”) w/50 “Youth Terms”
14.	(svap* OR “ecig” OR “e-cig” OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent* OR opio* OR opia* OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller* OR narcotic* OR drug* OR alcohol* OR Juul) w/50 “Youth Terms”
15.	“ACE” OR “ACEs” OR “adverse childhood experience” OR “adverse childhood experiences”

Custodians: Meta proposes that the above search terms be run on each agency’s custodial documents (including email and other custodial data sources), and relevant non-custodial data sources, that cover the entire period from January 1, 2012, to April 1, 2024, which encompasses the same time period from which Plaintiffs seek discovery, and have plead as the “Relevant Time[]” in Plaintiffs’ Complaint. *See* ECF No. 969; MDL Compl. ¶ 19 (alleging a “Relevant Time[]” that starts “no later than 2012”). Meta proposes that the search terms set forth above should be run against at least the custodians listed below. Custodians designated with an asterisk (*) have been affirmatively proposed and agreed to by the Minnesota AG’s office during the course of the Parties’ negotiations. To the extent the custodians below do not cover the relevant time period or all relevant topics for each agency, the State and/or agency should propose additional custodians to Meta, and Meta reserves the right to select additional custodians.

Agency	Custodian	Title
Department of Human Services	Teresa Steinmetz	Assistant Commissioner, Behavioral Health Administration

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Agency	Custodian	Title
Department of Human Services	Sara Rose	Chief Administrative Officer
Department of Human Services	Barbie Hess	Executive Assistant
Department of Human Services	Diane Neal	Director Mental Health Services, Behavioral Health Administration
Department of Human Services	Marvin Davis	Deputy Director of DYCF Child Safety and Permanency, Department of Children, Youth, and Families
Department of Human Services	Sarah Berg	DHS Central Media Communications Manager
Department of Human Services	Jon Wittman	DHS Program Area Communications Manager
Department of Human Services	Wade Brost	Executive Director of Mental Health and Substance Abuse Treatment Services
Department of Human Services	Julie Marquardt	Deputy Assistant Commissioner and Assistant Medicaid Director
Department of Human Services	Justine Nelson	Research Scientist
Department of Human Services	Yvonne Goodsky	Deputy Director of DYCF Child Safety and Permanency
Department of Human Services	Dr. Maria Harmandayan	Medical Director of Mental Health and Substance Abuse Treatment Services
Department of Human Services	Mindy Rogers	Director of Health, Safety & Policy Quality
Department of Human Services	Kristine Preston	Deputy Assistant Commissioner, Behavioral Health Administration
Department of Human Services	Eric Grumdahl	Assistant Commissioner, Behavioral Health Administration
Department of Human Services	James Thompson	Operations Data Practices and Compliance Specialist

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Agency	Custodian	Title
Department of Human Services	Jen Sather	Director Substance Use Disorder Services
Department of Human Services	Bharti Wahi	Interim Assistant Commissioner of DCYF Child Safety and Permanency, Department of Children, Youth, and Families
Department of Human Services	Greta Bergstrom	DHS Communications Director
Department of Human Services	Martiga Lohn	DHS Central Media Administrative Officer
Department of Human Services	Lisa Wilder	DHS Agency Communications
Department of Human Services	Kaye Zarn Mills	DCT Director of Policy
Department of Human Services	Diogo Reis	Health Improvement and Benefit Design Division Director
Department of Human Services	Dr. KyleeAnn Stevens	Executive Medical Director for Behavioral Health
Department of Human Services	Jennifer Sommerfeld	DCYF Government Relations Director
Department of Human Services	Katie Miller	DCT Policy Coordinator
Department of Human Services	Jordan Collins	Policy Coordinator – Mental Health and Substance Abuse Treatment Services
Department of Education	Macarre Traynham	Assistant Commissioner, Office of Equity and Engagement
Department of Education	Katona Barnes	Equity, Diversity, and Inclusion Center Director
Department of Education	Suzan Samaha	Equity, Diversity, and Inclusion Center Assistant Director
Department of Education	Jeff Plaman	Online and Digital Learning Specialist

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Agency	Custodian	Title
Department of Education	Adosh Unni	Director of Government Relations
Department of Education	Shana Morse	Assistant Director of Government Relations
Department of Education	Megan Arriola	Legislative Coordinator
Department of Education	Sarah Carter	STEM/Computer Science Integration Specialist
Department of Education	Olivia Christensen	Early Childhood Specialist
Department of Education	Andrea W Vazquez	Computer Science Specialist
Department of Education	Terri Swartout	School Health Coordinator
Department of Education	Sally Reynolds	Career and College Success Director
Department of Education	Michael Diedrich	Every Student Succeeds Act Policy Specialist
Department of Education	Dawn Udean	Procurement Unit Supervisor
Department of Education	Eric Billiet	High School Initiatives Supervisor
Department of Education	Michelle Kamenov,	Career and College Success Supervisor
Department of Education	Brad Hasskamp	State Adult Education Supervisor
Department of Education	Maira Rosas-Lee	Data Practices and Analytics Supervisor
Department of Education	Lana Peterson	Data Practices and Analytics Director

Exhibit 10B

Minnesota's

Proposal[s]

Minnesota Exhibits – Cover Page

Exhibit 1A: The Minnesota agencies’ proposals for search terms, custodians, and targeted searches for each agency at issue.

Minnesota Department of Education (MDE)

- **Exhibit 1A(1):** November 20, 2024 letter from MDE counsel to Meta regarding its targeted search.
- **Exhibit 1A(2):** December 4, 2024 letter from MDE counsel to Meta regarding its targeted search and custodians.
- **Exhibit 1A(3):** December 20, 2024 email exchange between MDE and Meta regarding search term proposals.

Minnesota Department of Human Services

- **Exhibit 1A(4):** November 20, 2024 letter from DHS counsel to Meta regarding its targeted search.
- **Exhibit 1A(5):** December 2, 2024 letter from DHS counsel to Meta regarding its targeted search.
- **Exhibit 1A(6):** December 6, 2024 email from DHS counsel to Meta regarding targeted search and custodians.
- **Exhibit 1A(7):** December 6, 2024 letter from DHS counsel to Meta regarding search term proposals and hit reports.

Exhibit 1C: The hit reports Minnesota agencies have been able to provide on agencies’ proposals and Meta’s proposal.

Minnesota Department of Education (MDE):

- **Exhibit 1C(1):** December 16, 2024 search term hit report using Meta’s 11/22 proposed terms against one custodian using date range 1/1/12 to 12/16/24. This hit report was provided to Meta the same day it was generated, on December 16, 2024. This hit report reflects deduplicated data.
- **Exhibit 1C(2):** December 16, 2024 search term hit report using MDE’s proposed terms focused on causation. This hit report was run against one custodian using date range 1/1/12 to 12/16/24. The hit report was provided to Meta the same day it was generated, December 16, 2024. This hit report reflects deduplicated data.

- **Exhibit 1C(3):** December 18, 2024 search term hit report using Meta's revised proposed terms. This hit report was run against 20 custodians without a date limiter. The hit report was provided to Meta the same day it was generated, December 18, 2024. This hit report reflects deduplicated data.
- **Exhibit 1C(4):** December 20, 2024 search term hit report using a revised proximity limiter (5-word) against Meta's proposed terms. This hit report was run against 20 custodians without a date limiter. The hit report was provided to Meta the same day it was generated, December 20, 2024. This hit report reflects deduplicated data.

Minnesota Department of Human Services (DHS):

- **Exhibit 1C(5):** December 16, 2024 search term hit report using Meta's 11/22 proposed terms against one custodian using date range 1/1/12 to 12/13/24. This hit report was provided to Meta the same day it was generated, on December 16, 2024. This hit report reflects deduplicated data.
- **Exhibit 1C(6):** December 16, 2024 search term hit report using DHS's proposed terms against one custodian without a date limiter. The hit report was provided to Meta the same day it was generated, December 16, 2024. This hit report reflects deduplicated data.
- **Exhibit 1C(7):** December 17, 2024 search term hit report using DHS's revised proposed terms against one custodian without a date limiter. The hit report was provided to Meta the same day it was generated, December 17, 2024. This hit report reflects deduplicated data.
- **Exhibit 1C(8):** December 20, 2024 search term hit report using Meta's revised proposal against one custodian without a date limiter. The hit report was provided to Meta the same day it was generated, December 20, 2024. This hit report reflects deduplicated data.
- **Exhibit 1C(9):** December 20, 2024 search term hit report using Meta's revised proposal against all of DHS's documents collected and processed into the review database to date, a process that is still ongoing since last week. The hit report was provided to Meta the same day it was generated, December 20, 2024. This hit report reflects deduplicated data.



The Office of
Minnesota Attorney General Keith Ellison
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November 20, 2024

By Electronic Mail:

ceppich@cov.com

szalazar@cov.com

Mr. Christopher K. Eppich
Mr. Santiago Zalazar
Covington & Burling LLP
1999 Avenue of the Stars
Los Angeles, CA 90067-4643

Re: *People of the State of California v. Meta Platforms, Inc.*
Court File No. 4:23-cv-05448

Dear Messrs. Eppich and Zalazar:

I write on behalf of the Minnesota Department of Education (“MDE”) concerning its ongoing meet and confer obligations pursuant to Federal Rule of Civil Procedure 45. As you are aware, your client Meta Platforms, Inc. (“Meta”) served a subpoena on MDE on July 29, 2024 requesting that MDE provide documents related to 22 separate categories, many of which included multiple subparts. MDE responded to the subpoena on August 28, 2024 as requested. In its response, MDE identified the subpoena’s extreme overbreadth and burdensomeness but committed to gathering documents to the extent practicable. Specifically, it identified for Meta publicly available responsive documents and committed to providing policies related to employee use of social media platforms. MDE never received any substantive response to its August 28 letter.

Instead, on September 23, 2024, Mr. Eppich sent MDE a second letter in which he indicated that based on a September 6, 2024 order from the Magistrate Judge in the underlying action, Meta was holding the subpoena “in abeyance until further notice.” To the extent that Meta had objections to MDE’s subpoena response, I am not aware of any authority that would allow Meta to unilaterally refuse to engage in a dialogue and simply hold such discussions “in abeyance” until such time in the future that Meta decided to engage in “further notice.” Nevertheless, MDE paused its actions at that time in response to this letter.

It has since come to MDE’s attention that Meta’s representation regarding the discovery situation in this matter did not end with the September 6 Order. In fact, it appears that on October 30, 2024 the Honorable Gonzalez Rogers issued a subsequent order that informed Meta that it could not unilaterally refuse to engage in the Rule 45 process. While Meta may dispute the plain language of the order, it is also my understanding that Minnesota Solicitor General Kramer has explained the basis for the position of the three State of Minnesota agencies that received a rule 45 subpoena. As such, I will not repeat it here.

Mr. Christopher K. Eppich
Mr. Santiago Zalazar
November 20, 2024
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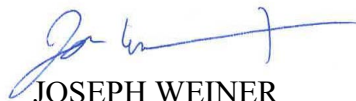
The meet and confer call on November 18, 2024 was the first time that I or MDE had an opportunity to engage in any discussion with Meta regarding MDE's response to the subpoena. During the call, Meta did not object to MDE's response and has not raised any issues with the intended scope of its production. Meta did ask that MDE explain the process it engaged in to prepare its response to the subpoena and determine the existence of responsive documents. I can inform you of the following:

Upon receipt of the subpoena and after conferring with counsel, MDE's Data Practices Compliance Official (the "DPCO") met with MDE's Data Practices and Analytics Team to review the subpoena, discuss the questions, and begin to identify the right individuals across the agency who MDE should contact in order to start identifying types of responsive documents. Based on those discussions, the DPCO contacted several teams across MDE to identify subject matter experts and asked if they had information regarding specific portions of the subpoena. For example, he contacted Equity Diversity & Inclusion leadership regarding topic #1 on the subpoena, contacted the Online and Digital Learning Specialist regarding many topics, but especially 2-4, and MDE's Government Relations team regarding topic #12.

The DPCO met with teams as appropriate to review topics and track down available data and potential documents. Where individuals identified that additional people may have responsive information, MDE expanded its request to those individuals to make sure that potentially responsive documents were collected. Before the review of the documents could be completed, MDE received the September 23 letter from Meta and did not proceed any further based on Meta's representations. Those documents have been gathered and await review, which MDE is prepared to do now that Meta appears to have agreed to reengage in the Rule 45 process.

I thank you for your attention to this matter and would request that you copy me on any future correspondence intended for MDE.

Sincerely,



JOSEPH WEINER
Manager, Tax and Education Divisions
Assistant Attorney General

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December 4, 2024

By Electronic Mail:
szalazar@cov.com

Mr. Santiago Zalazar
Covington & Burling LLP
1999 Avenue of the Stars
Los Angeles, CA 90067-4643

Re: *People of the State of California v. Meta Platforms, Inc.*
Court File No. 4:23-cv-05448

Dear Mr. Zalazar:

Thank you for your time yesterday in the meet and confer call. My client appreciates Meta's continued discussions concerning the response to Meta's Rule 45 subpoena and both parties' obligations pursuant to Judge Kang's November 26, 2024 Discovery Order (Doc. 1380). Based on our conversation, it is the Minnesota Department of Education's ("MDE") understanding that Meta sought additional information on two topics. This letter will address each in turn.

Names and Titles of Individuals Consulted About Documents and Information Potentially Responsive to the Subpoena.

The first piece of information Meta sought was the identity and position of the individuals MDE consulted with in seeking information responsive to the subpoena. Those individuals include:

Macarre Traynham, Assistant Commissioner, Office of Equity and Engagement
Katona Barnes, Equity, Diversity, and Inclusion Center Director
Suzan Samaha, Equity, Diversity, and Inclusion Center Assistant Director
Jeff Plaman, Online and Digital Learning Specialist
Adosh Unni, Director of Government Relations
Shana Morse, Assistant Director of Government Relations
Megan Arriola, Legislative Coordinator
Sarah Carter, STEM/Computer Science Integration Specialist
Olivia Christensen, Early Childhood Specialist
Andrea W Vazquez, Computer Science Specialist
Terri Swartout, School Health Coordinator
Sally Reynolds, Career and College Success Director
Michael Diedrich, Every Student Succeeds Act Policy Specialist
Dawn Udean, Procurement Unit Supervisor

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Eric Billiet, High School Initiatives Supervisor
Brad Hasskamp, State Adult Education Supervisor
Michelle Kamenov, Career and College Success Supervisor
Maira Rosas-Lee, Data Practices and Analytics Supervisor
Lana Peterson, Data Practices and Analytics Director

What Directions Did MDE Give These Individuals to Determine If Responsive Documents Exist?

Based on our December 3 conversation, Meta also seeks further information in addition to the explanation given in my November 20, 2024 letter regarding what these individuals were told to look for in response to the subpoena requests. Because this was an iterative process where specific individuals may have had follow-up or clarification questions, there may be nuances concerning specific topics that are not captured in this response. With that understanding, each of the individuals identified above were provided a copy of the subpoena and asked to search for and identify anything in their possession that might relate to the topics in Attachment A. As such, the time frame searched was January 1, 2012 to the present per the instructions in the subpoena. In addition to this instruction, MDE provided additional instructions to those individuals with specific areas of expertise to search for and provide documents for review including the following:

- Surveys, reports, evaluations, or analyses concerning the mental, social, emotional, or behavioral health of persons ages 13 to 18. Individuals were instructed that this could include technical assistance documents and trainings.
- Any testimony or documentation MDE provided to the legislature in relation to the kindergarten screen time statute (Minnesota Statutes 124D.166), and the digital well-being grant (HF 192).
- Programs, initiatives, efforts, or actions proposed or taken by MDE to address Young Users' use of Social Media Platforms, including any program, initiative, effort, or action to prevent, limit, encourage, or promote the use of Social Media Platforms by Young Users.
- Studies, programs, initiatives, efforts, or actions proposed or taken by the Minnesota Department of Education that sought to provide or promote internet access or phones, computers, tablets, or other electronic devices to Young Users.
- Information related to the legislation limiting screentime for pre-K including any guidance documents or professional development/training documents.
- Information related to use of computers and technology in schools; any statements, guidance, or policies MDE has put out on this topic.
- Discussions about digital well-being.
- Complaints to MDE by teachers or school districts regarding social media or cell phone use by Young Users and/or the need for acceptable use or other policies to address Young Users' use of social media or cell phones.
- Legislation or policies proposed by, proposed on behalf of, or testified on by MDE, regardless of whether such legislation or policies were enacted, regarding Young Users' use of Social Media Platforms.

In addition to the publicly available documents MDE identified for Meta in August, MDE provided Meta with a production on November 27. MDE will be following up shortly with some additional

Mr. Santiago Zalazar
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documents that were not included in the November 27 production. Once that production is completed and if Meta has additional specific documents that it believes are responsive, MDE will continue to meet and confer on “go get ‘em” requests consistent with the November 26 Order.

Thank you for your attention to this matter and please do not hesitate to contact me with any questions.

Sincerely,

A handwritten signature in cursive script that reads "Joe Weiner".

JOSEPH WEINER
Manager, Tax and Education Divisions
Assistant Attorney General

(651) 757-1431 (Voice)
(651) 297-4139 (Fax)
joseph.weiner@ag.state.mn.us

From: [Joseph Weiner](#)
To: [Yu, Janna](#); [Zalazar, Santiago](#); [Caitlin Micko](#); [Jason Pleggenkuhle](#)
Cc: [Patel, Mona](#); [Yeung, Christopher](#); [DeBoy, John](#); [Ogden, Jessica G](#); [James, Khala](#)
Subject: RE: Meta Litigation - Minnesota State Agency discovery
Date: Friday, December 20, 2024 9:51:45 AM
Attachments: [image001.png](#)
[image002.png](#)
[Search Term Report - MDE Revised Proximity Operator.pdf](#)

Janna,

Because we did not get a response from you yesterday and in an effort to continue to come to a resolution on this issue, we attempted to run a new search using a 5-word limiter as opposed to the 150 and 25 proposed by Meta. As you can see in the attached report, even with the revised limiter, the searches resulted in hits on over 860,000 documents and families.

As I indicated in my message below, these results seem to indicate that Meta's proposed terms are overbroad. I think we need to have further discussions regarding these terms. I am about to go into a deposition that I anticipate will take all day. Please let me know about your availability on Monday to discuss further.

Thanks,
Joe

Joe Weiner (*he/him*)

Assistant Attorney General | Education & Tax Divisions Manager

Office of the Minnesota Attorney General

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Helping people afford their lives and live with dignity, safety, and respect

From: Joseph Weiner
Sent: Thursday, December 19, 2024 9:27 AM
To: Yu, Janna <JYu@cov.com>; Zalazar, Santiago <SZalazar@cov.com>; Caitlin Micko <Caitlin.Micko@ag.state.mn.us>; Jason Pleggenkuhle <Jason.Pleggenkuhle@ag.state.mn.us>
Cc: Patel, Mona <mpatel@cov.com>; Yeung, Christopher <cyeung@cov.com>; DeBoy, John <jdeboy@cov.com>; Ogden, Jessica G <JOgden@cov.com>; James, Khala <KJames@cov.com>
Subject: RE: Meta Litigation - Minnesota State Agency discovery

Janna,

MDE does not agree with Meta's conclusion that the documents and searches conducted so far by MDE are insufficient. The large number of hits that occurred from Meta's first set of search terms across Jeff Plaman's emails hit on approximately 40% of his entire .pst file and appeared to encompass many non-relevant documents. In other words, the overbreadth of Meta's terms likely account for the large number of hits identified.

In an effort to try to resolve this dispute, however, we ran Meta's revised proposed search terms against all 19 custodians as you requested. Attached is the search term hit report. You will see that this search returned over 1.2 million documents and constitutes over 30% of all the data maintained by these individuals.

These results confirm that the limiters that Meta has proposed are ineffective and unworkable. I can tell you that I honestly cannot recall a case in my career where parties have used proximity limiters of 25 words let alone 150. The search term with the 25-word limiter alone turns up nearly a million documents. We will not review documents under this current proposal.

I believe we need to have further discussions about reasonable searches in this matter. I have some availability today if your team and Jason and/or Caitlin are available.

Thank you for your attention to this matter,
Joe

Joe Weiner (*he/him*)

Assistant Attorney General | Education & Tax Divisions Manager

Office of the Minnesota Attorney General

445 Minnesota Street, Suite 600, Saint Paul, MN 55101

Office: 651-757-1431 | Mobile: 612-708-2831 | Website: ag.state.mn.us

Helping people afford their lives and live with dignity, safety, and respect

From: Yu, Janna <JYu@cov.com>

Sent: Wednesday, December 18, 2024 1:54 PM

To: Joseph Weiner <Joseph.Weiner@ag.state.mn.us>; Zalazar, Santiago <SZalazar@cov.com>; Caitlin Micko <Caitlin.Micko@ag.state.mn.us>; Jason Pleggenkuhle <Jason.Pleggenkuhle@ag.state.mn.us>

Cc: Patel, Mona <mpatel@cov.com>; Yeung, Christopher <cyeung@cov.com>; DeBoy, John <jdeboy@cov.com>; Ogden, Jessica G <JOgden@cov.com>; James, Khala <KJames@cov.com>

Subject: RE: Meta Litigation - Minnesota State Agency discovery

Dear Joe,

Thank you for sending the Department of Education's (DOE) search term proposal and hit reports on Jeff Plaman, and we have a few concerns / questions:

- The hit reports on Meta's 11.22 terms (26,035 hits) suggests that additional relevant materials may be available that are not included in MDE's production of 2,406 pages on Nov. 20. We learned from you that MDE has already requested documents from specific individuals (as described in your Dec. 4 letter), we presume the custodian names are readily available. Please confirm that MDE will run search terms across the custodial files of the individuals identified in your Dec. 4 letter:

- Macarre Traynham, Assistant Commissioner, Office of Equity and Engagement
 - Katona Barnes, Equity, Diversity, and Inclusion Center Director
 - Suzan Samaha, Equity, Diversity, and Inclusion Center Assistant Director
 - Jeff Plaman, Online and Digital Learning Specialist
 - Adosh Unni, Director of Government Relations
 - Shana Morse, Assistant Director of Government Relations
 - Megan Arriola, Legislative Coordinator
 - Sarah Carter, STEM/Computer Science Integration Specialist
 - Olivia Christensen, Early Childhood Specialist
 - Andrea W Vazquez, Computer Science Specialist
 - Terri Swartout, School Health Coordinator
 - Sally Reynolds, Career and College Success Director
 - Michael Diedrich, Every Student Succeeds Act Policy Specialist
 - Dawn Udean, Procurement Unit Supervisor
 - Eric Billiet, High School Initiatives Supervisor
 - Brad Hasskamp, State Adult Education Supervisor
 - Michelle Kamenov, Career and College Success Supervisor
 - Maira Rosas-Lee, Data Practices and Analytics Supervisor
 - Lana Peterson, Data Practices and Analytics Director
- We note your suggested alternative search terms contemplates running alternate causation terms in conjunction with social media terms. Judge Kang explicitly confirmed that social media-related harm is not the exclusive focus of discovery: (1) the state agencies cannot narrowly define discovery to exclude alternate causation documents; and (2) the state agencies cannot require that every search string include a “social media” term.

To help alleviate concerns, Meta proposes the attached search terms slimmed down from Meta’s 11.22 proposal. The Other Case Issues terms eliminates some of the terms such as law* that may be causing large numbers of hits.

Janna Yu

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From: Joseph Weiner <Joseph.Weiner@ag.state.mn.us>

Sent: Monday, December 16, 2024 7:05 PM

To: Zalazar, Santiago <SZalazar@cov.com>; Caitlin Micko <Caitlin.Micko@ag.state.mn.us>; Jason Pleggenkuhle <Jason.Pleggenkuhle@ag.state.mn.us>

Cc: Patel, Mona <mpatel@cov.com>; Yeung, Christopher <cyeung@cov.com>; DeBoy, John <jdeboy@cov.com>; Yu, Janna <JYu@cov.com>; Ogden, Jessica G <JOgden@cov.com>; James, Khala <KJames@cov.com>

Subject: RE: Meta Litigation - Minnesota State Agency discovery

[EXTERNAL]

Hello Santiago,

As discussed, please see the attached hit reports for representative custodian Jeff Plaman. We ran one report with the search terms we received on November 22 and have run a second search for a proposed alternative search that focuses on causation.

As you can see from the report on the meta terms, it returns hits on 30,843 documents out of a total of just over 75,000, or a greater than 40% hit rate. I have not yet had an opportunity to review these hits to see if there are specific terms that are causing the excessive number, but I will note that the final search alone appears to hit on almost 33% of the review set.

The alternative search terms result in a total of 3,503 documents. Once you have had an opportunity to review, we can discuss next steps.

Thanks,
Joe

Joe Weiner (*he/him*)

Assistant Attorney General | Education & Tax Divisions Manager

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Helping people afford their lives and live with dignity, safety, and respect

From: Joseph Weiner

Sent: Wednesday, December 4, 2024 4:37 PM

To: Zalazar, Santiago <SZalazar@cov.com>; Caitlin Micko <Caitlin.Micko@ag.state.mn.us>; Jason Pleggenkuhle <Jason.Pleggenkuhle@ag.state.mn.us>

Cc: Patel, Mona <mpatel@cov.com>; Yeung, Christopher <cyeung@cov.com>; DeBoy, John <jdeboy@cov.com>; Yu, Janna <JYu@cov.com>; Ogden, Jessica G <JOgden@cov.com>; James, Khala <KJames@cov.com>

Subject: RE: Meta Litigation - Minnesota State Agency discovery

Santiago,

Attached please find my correspondence on behalf of the Minnesota Department of Education. Please let me know if you have any questions.

Joe

Joe Weiner (he/him)

Assistant Attorney General | Education & Tax Divisions Manager

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Helping people afford their lives and live with dignity, safety, and respect

From: Zalazar, Santiago <SZalazar@cov.com>

Sent: Wednesday, December 4, 2024 1:20 PM

To: Caitlin Micko <Caitlin.Micko@ag.state.mn.us>; Jason Pleggenkuhle
<Jason.Pleggenkuhle@ag.state.mn.us>

Cc: Aaron Winter <Aaron.Winter@ag.state.mn.us>; Jacob Harris <Jacob.Harris@ag.state.mn.us>;
Bradley Simon <Bradley.Simon@ag.state.mn.us>; Kelly Kemp <Kelly.Kemp@ag.state.mn.us>; Joseph
Weiner <Joseph.Weiner@ag.state.mn.us>; Stephen Melchionne
<Stephen.Melchionne@ag.state.mn.us>; Janine Kimble <Janine.Kimble@ag.state.mn.us>; Patel,
Mona <mpatel@cov.com>; Yeung, Christopher <cyeung@cov.com>; DeBoy, John
<jdeboy@cov.com>; Yu, Janna <JYu@cov.com>; Ogden, Jessica G <JOgden@cov.com>; James, Khala
<KJames@cov.com>

Subject: RE: Meta Litigation - Minnesota State Agency discovery

Importance: High

You don't often get email from szalazar@cov.com. [Learn why this is important](#)

Dear Caitlin and Jason,

Thank you for the productive call.

It was good to meet counsel for the various non-subpoenaed state agencies for the first time. We understand that Solicitor General Kramer (whom I have BCC'd in this email, for visibility) will no longer be representing these agencies. We were sorry to hear that counsel from the Department of Commerce ("DoC") was unable to join, but we are in receipt of the e-mail that he sent shortly before we met (attached).

Consistent with Judge Kang's order that "the Parties ... engage in prompt and transparent negotiations for purposes of identifying reasonable search terms and custodians and exchanging hit reports," *see* ECF No. 1380 at 2-3, during our call, Meta requested an update on the Minnesota state agencies' efforts to comply with their court obligations, discussed next steps with those agencies that had run Meta's revised proposed search terms, and, for those agencies that had already collected documents, posed basic questions regarding the processes used to locate responsive documents. Below is Meta's understanding of the Parties' discussions.

Office of the Governor

Meta shared numerous examples of publicly available information it found through simple Google searches to show that the agency is likely to have additional responsive documents, other than the three files it has produced.

Following a discussion of the description that Minnesota provided regarding the efforts undertaken by the Office of the Governor to locate relevant documents, as described in your November 27 letter (attached), counsel for this agency agreed to follow up by today, December 4, regarding the agency's commitment to provide the following information:

- Names and roles of the "staff [identified] whose work overlaps with the subject of the discovery," as well as the names and roles of the individuals of the "office's head of policy and the policy staff responsible for covering mental health, children, schools, and human services," all of whom were asked if "they had any data relating to children's mental health and social media."
- Description of the agency's document retention policies.
- The instructions/search terms/keywords used to locate responsive documents.
- The time period covered.

Meta considers the relevant time period to be the same as the one that the AGs insisted apply to Meta: January 1, 2012-April 1, 2024.

Office of Higher Education ("OHE")

Following a discussion of the description that Minnesota provided regarding the efforts undertaken by OHE to locate relevant documents, as described in your November 27 letter, counsel for this agency agreed to follow up by today regarding the agency's commitment to provide the following information:

- Names and roles of the OHE division managers and the staff consulted or believed to have "documents or communications relating to young users' use of social media platforms and related harms."
- The instructions/search terms/keywords used to locate responsive documents.
- The time period covered.

Meta is considering deprioritizing this agency.

Department of Human Services (DHS)

Following a discussion of the description that DHS provided regarding the efforts undertaken to locate relevant documents, as described in DHS's November 20 letter (attached), Meta asked DHS counsel to provide or confirm (i) the names and the roles of the individuals consulted or believed to have responsive documents (*e.g.*, "program area leaders [contacted] to gather information and collect MNDHS-generated documents and information related to teen mental health or social media use"; "the [Behavioral Health Administration] staff member[s] [instructed] to search for and provide any responsive documents in their personal network drives and emails"; etc.), (ii) the instructions DHS counsel mentioned that were used, and (iii) the time period covered. Meta is requesting this information so that it can verify the procedures DHS used to identify relevant documents, and hopefully confirm that letter briefing will not be required with respect to DHS's efforts to comply with the court's order. Meta has requested and received this basic information from numerous state agencies without issue.

Notwithstanding Meta's explanations that this basic information is needed to determine the adequacy of the searches DHS conducted, DHS refused to provide any of the requested

information. Surprisingly, DHS appeared to suggest that the agency would not comply with its court obligations unless Meta provided responses to the eleventh-hour, 12-page letter DHS sent Meta the night before the Parties' meeting (attached).

Minnesota Department of Health ("MDH")

Following a discussion of the description that Minnesota provided regarding the efforts undertaken by MDH to locate relevant documents, as described by your November 27 letter and MDH's December 3 email (attached), counsel for this agency agreed to—and in a subsequent email (attached) did—confirm that the time period covered by MDH started on January 1, 2012. Meta is not seeking additional information from MDH at this time. Meta reserves all rights.

Minnesota Management and Budget ("MMB")

Following a discussion of the hit-count results included in your December 3 email (attached), counsel for MMB agreed to provide a counterproposal to Meta's proposed revised search terms by today.

Department of Employment and Economic Development ("DEED")

Following a discussion of the hit-count results included in your December 3 email (attached), counsel for DEED agreed to provide a counterproposal to Meta's proposed revised search terms, as well as the agency's document retention policies, by today. Meta agreed to consider deprioritizing this agency.

Department of Education ("MDE")

Following a discussion of the description that MDE provided regarding the efforts undertaken to locate relevant documents, as described in MDE's November 20 letter (attached), counsel for this agency agreed to follow up by today regarding the agency's commitment to provide the following information:

- Names and roles of the "subject matter experts" MDE identified.
- The instructions/search terms/keywords used to locate responsive documents.
- The time period covered.

Department of Commerce

Please provide the names of the "heads of the units within Commerce [that counsel consulted] to determine if they have any responsive documents" during the "broad initial search[] [DoC conducted] to determine where it may have documents referencing Meta or Facebook," as outlined in Minnesota's November 27 letter and DoC's December 3 email. Additionally, given that DoC appears to have omitted to run highly relevant terms (*e.g.*, "Instagram"), please provide the instructions used. Meta is considering deprioritizing this agency.

Please let us know your availability for another conferral. Otherwise, we will have to exchange letter briefs by Friday (December 6) for submission to the Court on Monday (December 9).

Thank you.

Santiago M. Zalazar

Santiago Zalazar

Pronouns: He/Him/His

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From: Caitlin Micko <Caitlin.Micko@ag.state.mn.us>

Sent: Tuesday, December 3, 2024 4:41 PM

To: Zalazar, Santiago <SZalazar@cov.com>; Patel, Mona <mpatel@cov.com>; Yu, Janna <JYu@cov.com>

Cc: Jason Pleggenkuhle <Jason.Pleggenkuhle@ag.state.mn.us>; Aaron Winter <Aaron.Winter@ag.state.mn.us>; Jacob Harris <Jacob.Harris@ag.state.mn.us>; Bradley Simon <Bradley.Simon@ag.state.mn.us>; Kelly Kemp <Kelly.Kemp@ag.state.mn.us>; Joseph Weiner <Joseph.Weiner@ag.state.mn.us>; Stephen Melchionne <Stephen.Melchionne@ag.state.mn.us>; Janine Kimble <Janine.Kimble@ag.state.mn.us>

Subject: Meta Litigation - Minnesota State Agency discovery

[EXTERNAL]

Santiago, Janna, and Mona:

Thank you for the call today. As I mentioned, Solicitor General Liz Kramer has had to step back from state agency representation in this case due to unrelated matters. The attorneys representing the state agencies are listed below and copied on this email:

Department of Human Services – Aaron Winter and Jacob Harris
Department of Health – Brad Simon and Kelly Kemp
Department of Education – Joe Weiner
Office of Higher Education – Joe Weiner
Department of Commerce – Steve Melchionne
Minnesota Management & Budget – Janine Kimble
Governor's Office – Janine Kimble
Department of Employment and Economic Development – Kelly Kemp and Brad Simon

Jason Pleggenkuhle and I continue to represent the Plaintiff in this case. Please copy us on all correspondence with the state agency attorneys.

Thank you,
Caitlin



Caitlin Micko (*she/her*)

Assistant Attorney General | Consumer Protection Division

Office of the Minnesota Attorney General

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November 20, 2024

Via email only

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Janna Yu – jyu@cov.com
Santiago Zalazar – szalazar@cov.com

**Re: Meta Subpoena to MNDHS in *In re: Social Media Adolescent
Addiction/Personal Injury Products Liability Litigation*
N.D. Cal. Case No. 4:22-md-03047-YGR**

Dear Counsel:

I write on behalf of the Minnesota Department of Human Services (“MNDHS”) to follow up on the November 18, 2024 meet-and-confer about Meta’s July 29, 2024 subpoena to MNDHS in the above-referenced matter (“Subpoena”).

I. Relevant Background.

We were surprised to hear this week that Meta believed MNDHS was not complying with its Rule 45 obligations under the Subpoena. This position is contrary to the facts and the law.

As an initial matter, Meta has done very little to engage with MNDHS’ objections to the scope of the Subpoena and nothing to timely raise concerns it now claims to have with MNDHS’ collection and production. As you know, MNDHS timely served objections and responses to the Subpoena on August 19, 2024. The parties met and conferred by video conference on August 26, 2024 to discuss those objections and responses. The parties reached a preliminary agreement on the scope of the Subpoena, including that MNDHS would not conduct a custodian-by-custodian keyword search of responsive documents.¹ These limitations, as well as follow-up steps for

¹ During a November 18, 2024 meet-and-confer, Mr. Zalazar represented that he did not have a specific recollection of our August 26 discussion in that regard. However, counsel represented to

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November 20, 2024
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MNDHS regarding specific Subpoena requests, were memorialized in an email on September 4, 2024. Meta never responded with any contrary understanding of what the parties agreed during the meet-and-confer.

Accordingly, MNDHS began conducting a reasonable search for responsive documents consistent with its objections and the August 26 meet-and-confer. MNDHS made an initial production of documents on September 9, 2024. Meta did not raise any issues or concerns regarding that production; Meta did not, for instance, express that MNDHS' production was premature pending agreement upon or more information about some specific process for document search and collection.

Then, more than two weeks later, on September 24, 2024, Meta sent MNDHS an apparent form letter saying it would unilaterally hold the subpoena "in abeyance" but citing no authority allowing it to do so; Ninth Circuit authority instead says Meta could not do so. *Multimedia Pat. Tr. v. DirecTV, Inc.*, No. 09CV0278-H (CAB), 2011 WL 13100720, at *2 (S.D. Cal. June 30, 2011) ("This Court rejects MPT's contention that it could hold the California Subpoenas in abeyance for over a year and revert to them as the subpoenas subject to enforcement by this Court, while actively pursuing and negotiating production pursuant to the later served Texas Subpoenas.")

On October 30, 2024, regarding Meta's "abeyance" of its subpoenas, Judge Gonzalez Rogers directed subpoenaed agencies to "immediately resume and continue document productions based on the contents of and responses to those Rule 45 subpoenas" and ordered that Meta "shall not unilaterally cease ongoing negotiations with agencies during the pendency of this Court's review." Judge Gonzalez Rogers also directed the state agencies, "to the extent [they] have already collected and were preparing to produce documents in response to the subpoenas, [to] continue that process and produce the documents." (ECF No. 1292.)

Notwithstanding Meta's failure of diligence, MNDHS has undertaken every effort to "immediately resume" its document collection and production and expects make a final production in response to the Subpoena on November 22.

Shockingly, however—especially considering the specific negotiation history above—Meta took the position during the November 18 meet-and-confer that rather than resuming or continuing its response to the Subpoena, MNDHS must entirely *restart* that response by providing search terms and custodians. As MNDHS understands it, Meta relied for this position on two recent orders issued by Magistrate Judge Kang in this matter (ECF Nos. 1291, 1299) that at the very least do not, in light of Judge Gonzalez Rogers' order referenced above, apply any such requirement to

MNDHS that Meta will not tell the Court MNDHS agreed to conduct a search term and custodian ESI search in response to the Subpoena. Notwithstanding, the parties did discuss the prospect of such a search in August, and MNDHS informed Meta of its position that such a search would be unduly burdensome. MNDHS' September 4 email, setting forth the global limitations the parties discussed, corroborates this understanding, as those limitations make no sense in light of any agreement that an ESI search using search terms and custodians would be conducted. MNDHS' position is also set forth in detail in its objections and responses to the Subpoena.

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MNDHS as a subpoenaed agency. Further, when MNDHS asked during the November 18 call whether Meta told Judge Kang that it had already negotiated with MNDHS about the Subpoena and reached preliminary agreements as to its scope, Meta refused to answer. Meta's cynical attempt to negate its prior negotiation with MNDHS and restart a nearly completed Subpoena process is unacceptable.

Nevertheless, in hopes of reaching agreement on these issues, MNDHS agreed to provide the information below about its document search and production in response to the Subpoena.

II. Summary of MNDHS' Investigation, Collection, and Production of Documents.

At Meta's request, and to address any concerns Meta may have that MNDHS has not conducted a reasonable search in response to the Subpoena, MNDHS provides the following summary of its efforts to comply with it. In doing so, MNDHS does not waive any privilege or protection from disclosure under the work product doctrine, attorney-client privilege, common interest privilege, or any other privilege, and any disclosure here does not operate as a waiver of MNDHS' rights to assert those privileges and protections later.

Upon receipt of the Subpoena, MNDHS counsel (which included undersigned MNDHS' litigation counsel at the Minnesota Attorney General's Office and in-house agency counsel) reviewed and analyzed all 58 requests for documents² to determine which of MNDHS' program and operation areas might have materials and information related to the requests, and the relative burdens of searching for and producing that information. MNDHS in-house counsel began meeting with program area leaders to gather information and collect MNDHS-generated documents and information related to teen mental health or social media use. This information-gathering informed MNDHS' objections and responses to the Subpoena as well as its position at the parties' August 26 meet-and-confer.

As noted above, the agreements made during the meet-and-confer were memorialized in counsel's September 4 email. In reliance on those agreements, MNDHS expended considerable effort and agency resources to identify and collect responsive documents. MNDHS has numerous program areas of varying degrees of relevance to the subject matter of the litigation, and its approach was tailored to each program area's particular structure and subject matter.³ MNDHS relied on interviews and meetings with agency staff and counsel in determining to proceed as follows:

Behavioral Health Administration ("BHA"). BHA is tasked with ensuring the statewide availability of mental health programs and services for adult and children's mental health

² As explained in our Objection, the Subpoena requested 58 distinct categories of documents that were framed as 22 requests.

³ MNDHS did not search every single program or operational area because doing so would be unreasonable and fruitless. An overview of MNDHS' agencywide organization is publicly available online. See <https://mn.gov/MNDHS/general-public/about-MNDHS/organization-management/agencywide-organization/>.

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and alcohol and drug abuse services. BHA designated eight staff members to search the BHA shared network drive, MNDHS intranet, MNDHS' public website, the Minnesota Reference Library's mandated reports database, and the Wilder Research topics database, for responsive documents or information involving agency programs, public policies, initiatives, and any studies, research, surveys, analyses and similar information that MNDHS had any role in initiating or generating, related to teen mental health or social media use. BHA also instructed every BHA staff member to search for and provide any responsive documents in their personal network drives and emails. These documents have been produced or are in the process of being produced.

MNDHS estimates non-attorney BHA staff spent approximately 45 hours responding to the Subpoena.

Healthcare Administration ("HCA"). HCA's predominant responsibility is administering Minnesota's Medicaid and Medicare programs. Counsel worked with three members of HCA leadership to identify responsive documents. HCA identified limited responsive material apart from individual patient-level records (which Meta has said it is not seeking).

MNDHS estimates non-attorney HCA staff spent approximately 2 hours responding to the Subpoena.

Ageing and Disability Services ("ADS"). ADS is responsible for developing policies and best practices relating to home and community-based services for seniors and adults with disabilities. Counsel worked with three members of ADS leadership and identified limited responsive material.

MNDHS estimates non-attorney ADS staff spent approximately 2 hours responding to the Subpoena.

Direct Care and Treatment ("DCT"). DCT operates specialized behavioral and mental health facilities that provide direct care and treatment to persons civilly committed in the Minnesota court system as well as individuals with developmental and intellectual disabilities that cannot be served by traditional healthcare providers. Fifteen leaders within DCT's various programs, including medical directors, policy directors and coordinators, program directors, and health information management directors were consulted for MNDHS' responses and collection and production of responsive documents. The DCT leadership were asked and were not able to identify any DCT involvement in generating research, surveys, analyses, or similar information related to teen mental health or social media use. The DCT leadership were also asked and were not able to identify any projects, initiatives, analyses, or similar activities that included reports or reviews of trends reflecting referral rates for DCT child and adolescent behavioral and mental health services. DCT searched for, located and provided program policies and staff policies and procedures related to social media that existed on DCT shared network drives and intranet

John DeBoy et al.
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sites, as well as policy staff's own computers and personal drives. All materials that were identified through the above efforts were produced or are in the process of being produced.

MNDHS estimates non-attorney DCT staff spent approximately 17 hours responding to the Subpoena.

Department of Children, Youth, and Family ("DCYF"): DCYF is responsible for numerous programs providing both economic assistance for eligible children and families and direct services and supports in the form of child protection services, out of home care, adoption support, and mental health programming for at-risk youth, among others. Agency leadership within these programs were directed to have their team members search for and provide any information comprising agency programs, public policies, initiatives, and any studies, research, surveys, analyses and similar information that the agency had any role in initiating or generating, relating to teen mental health or social media use. These materials were produced or are in the process of being produced.

MNDHS estimates non-attorney DCYF staff spent approximately 5 hours responding to the Subpoena.

MNDHS Human Resources and Agency Effectiveness ("MNDHS HR"): MNDHS HR, among other roles, oversees and tracks the MNDHS budget and program allocations. Six leaders in MNDHS HR's finance division were involved in reviewing relevant Subpoena requests and determining the existence and collection of budget information that MNDHS produced.

MNDHS estimates non-attorney MNDHS HR staff spent approximately 2 hours responding to the Subpoena.

Agency legislative liaisons, community outreach, and communications: MNDHS has government relations and community outreach personnel that work on behalf of the agency at large. Some program areas also have their own community outreach personnel. MNDHS identified and met with its legislative liaison and community outreach personnel for the agency and specific program areas to discuss the items specified for follow up in the September 4 email. MNDHS also has a communications office. Counsel worked with four leaders in the communications office to search for social media outreach, expenditures, and content, as identified in the September 4 email. This material was or is being produced. Estimated non-attorney staff time spent by these groups is included in estimates above.

We trust the summary above satisfies Meta's concerns that MNDHS has not diligently searched for and produced any materials that may be responsive to the Subpoena. To the extent Meta has any remaining concerns about MNDHS' compliance, we invite Meta to raise those concerns directly with MNDHS' undersigned counsel.

As indicated, MNDHS expects to make a final production of all outstanding documents this week.

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November 20, 2024
Page 6 of 6

Sincerely,

/s/ Aaron Winter

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Attorneys for Department of Human Services



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Minnesota Attorney General Keith Ellison
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December 2, 2024

Via email only

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**Re: Meta Subpoena to MNDHS in *In re: Social Media Adolescent
Addiction/Personal Injury Products Liability Litigation*
N.D. Cal. Case No. 4:22-md-03047-YGR**

Dear Counsel:

I write regarding two issues: (1) Meta’s email last night asking for “additional details about the search process [MNDHS] used” to produce documents;¹ and (2) Meta’s related Rule 34 Requests for Production of Documents (“Rule 34 Requests”) served upon the Office of the Minnesota Attorney General (“MN AGO”).

Meta’s Request for “Additional Details”

First, as to Meta’s request for more information about documents MNDHS already produced: at the November 18, 2024 meet and confer, Meta took the position that MNDHS was required to provide search terms and custodians solely on the basis of Judge Kang’s October 29 and November 1 orders (Dkt. 1291 and 1299, respectively.) MNDHS disagreed with Meta’s interpretation of Judge Kang’s orders, but agreed to describe its search efforts in response to Meta’s concerns that it was unable to determine whether a reasonable search was conducted. MNDHS provided this information in a letter on November 20, 2024, consistent with Judge Kang’s later-expressed expectation that agencies, like MNDHS, that collected documents using a process other

¹ I was not included on this email despite that Meta knows I represent MNDHS and the email relates directly to non-party subpoena discovery conducted under Rule 45. I expect to be copied on all communications that relate to MNDHS.

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than search terms “disclose transparently the processes used to locate the responsive documents.” (Dkt. 1380, p. 3.) MNDHS also made a final production pursuant to the Subpoena on November 22, 2024.

MNDHS has received no communications purporting to raise any concerns with its compliance with the Subpoena, or to enforce the Subpoena, despite Judge Gonzalez Rogers’ order requiring Meta and the subpoenaed parties to resume subpoena efforts “immediately.” (*See* October 30, 2024 Order, Dkt. 1292.) Meta’s email last night, for its part, does not identify any reason *why* MNDHS’s existing document collection process was insufficient despite Meta having nearly two weeks since MDHS described its search procedures to continue discussing this topic. MNDHS accordingly considers these issues closed. To the extent Meta disagrees, however, please identify: (1) for each Subpoena request, any and all concrete, affirmative reasons Meta has to believe that MNDHS did not conduct a reasonable search, in light of the description MNDHS provided and Judge Kang’s direction; and (2) for each Subpoena request, any and all concrete, affirmative reasons Meta has to believe that MNDHS has any unproduced responsive documents and what Meta believes those unproduced documents are. Given Meta’s failure to timely raise any concerns it may have about MNDHS’ production in the time elapsed since November 20—and consistent with the timeline Meta found sufficient in its email last night—please provide this information by **tomorrow, Tuesday, Dec. 3.**

Meta’s Rule 34 Requests

Second, MNDHS understands Meta now takes the position that MNDHS must respond to its Rule 34 Requests. However, MNDHS is unaware of any authority that requires an entity to be subject to the Rule 34 Requests and the Subpoena at the same time. As Meta knows, MNDHS is not a party to this matter and its documents are not within the possession, custody, or control of the MN AGO.

However, to avoid further prolonging this dispute, MNDHS will construe the Rule 34 Requests as applied to MNDHS as additional document requests within the Subpoena. MNDHS responds to those requests as follows, and expressly incorporates its general and specific objections to the Subpoena as if fully set forth herein. MNDHS also incorporates its September 4, 2024 email memorializing the parties’ agreements as to the Subpoena’s scope during their August 26 meet and confer. Further, to the extent that the Rule 34 Requests reference “Plaintiff,” MNDHS objects to such requests because MNDHS is not a Plaintiff and therefore those requests are inapplicable to MNDHS. Without waiving that objection, however, and to the extent that the term “Plaintiff” is construed to include MNDHS, MNDHS provides its responses below.²

² To the extent Meta continues to believe MNDHS was or is required to provide search terms, Judge Kang clarified that is incorrect. Again, he stated that “[i]f state agencies collected documents for production using some other process [than ESI search terms], they are likewise expected to disclose transparently the process used to locate the responsive documents. The Court strongly encourages Meta to work out informal deals with state agencies to facilitate document production, such as agreements to use ‘go get ‘em’ requests in lieu of search terms.” (Dkt. 1380.) As noted, MNDHS has already provided a description of the process it used to locate responsive documents.

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With respect to documents that have been produced by MNDHS in response to the Subpoena and which are subject to overlapping requests identified below, MNDHS specifically refers Meta to its November 20, 2024 letter describing the efforts it undertook to locate and collect responsive documents.

Set 1

Request No. 1. All Documents referenced in or used to prepare the Complaint.

Response: This request is not applicable to MNDHS. MNDHS was not involved in preparing the Complaint.

Request No. 2. All Documents Relating to the alleged relationship between Social Media Platforms and Young Users' Mental Health and Wellbeing.

Response: This request is fully encompassed by Subpoena Request 2, 3, 4, 5 and others. MNDHS incorporates its responses and objections to those requests here. MNDHS has already produced all documents located with a reasonable search.

Request No. 3. All Documents Relating to the relationship between Social Media Platforms and the harms alleged in the Complaint (including depression, anxiety, sleep disturbances, suicide, self-harm, compulsive use, and addiction).

Response: This request is fully encompassed by Subpoena Request 2, 3, 4, 5 and others. MNDHS incorporates its responses and objections to those requests here. MNDHS has already produced all documents located with a reasonable search.

Request No. 4. All Communications between Plaintiff and any federal, state, or local official, agency, body, actor, or political subdivision Relating to Young Users' use of Social Media Platforms, Young Users' Mental Health and Wellbeing, and/or any of the conduct and harms alleged in the Complaint (including depression, anxiety, sleep disturbances, suicide, self-harm, compulsive use, and addiction).

Response: This request is encompassed by Subpoena Request 2, 3, 4, 5, 17 and others. MNDHS incorporates its responses and objections to those requests here. MNDHS has already produced all documents located with a reasonable search.

Request No. 5. All Communications between Plaintiff and any lobbyists (i.e., persons who communicate directly or indirectly with state government officials for the purpose of influencing action by the official for compensation) Relating to Young Users' use of Social Media Platforms, Young Users' Mental Health and Wellbeing, and/or any of the conduct and harms alleged in the

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Response: This request is encompassed by Subpoena Request 6 and 17. MNDHS incorporates its responses and objections to those requests here.

Request No. 6: All Communications between Plaintiff and any public or private school, school board, or parent-teacher association in Minnesota Relating to Young Users' use of Social Media Platforms, Young Users' Mental Health and Wellbeing, and/or any of the conduct and harms alleged in the Complaint (including depression, anxiety, sleep disturbances, suicide, self-harm, compulsive use, and addiction).

Response: This request is encompassed by Subpoena Request 8 and 17. MNDHS incorporates its responses and objections to those requests here.

Request No. 7: All posts on any Social Media Platform or public statements in any forum, in which Plaintiff discusses topics Relating to Young Users' use of Social Media Platforms, Young Users' Mental Health and Wellbeing, and/or any of the conduct and harms alleged in the Complaint (including depression, anxiety, sleep disturbances, suicide, self-harm, compulsive use, and addiction).

Response: This request is encompassed by Subpoena Request 16. MNDHS incorporates its responses and objections to that request here. MNDHS has already produced all documents located with a reasonable search.

Request No. 8: All posts on any Social Media Platform or public statements in any forum, in which Plaintiff encouraged Young Users' use of Social Media Platforms or otherwise stated that such usage could be beneficial for Young Users' Mental Health and Wellbeing.

Response: This request is encompassed by Subpoena Request 2, 16, and 21. MNDHS incorporates its responses and objections to those requests here.

Request No. 9: All Communications between Plaintiff and any group or organization that advocates for Young Users' Mental Health and Wellbeing.

Response: This request is encompassed by Subpoena Request 17. MNDHS incorporates its responses and objections to that request here.

Request No. 10: All Communications between Plaintiff and any group or organization that advocates against Young Users' use of Social Media Platforms and/or any of the conduct and harms alleged in the Complaint (including depression, anxiety, sleep disturbances, suicide, self-harm, compulsive use, and addiction).

Response: This request is encompassed by Subpoena Request 17. MNDHS incorporates its responses and objections to that request here.

Request No. 11: All Documents relating to consumer complaints (including the name and address of the sender, name and address of the recipient, date received, description of the comment,

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complaint, or inquiry, and any response) about Young Users' use of Social Media Platforms, and/or any of the conduct and harms alleged in the Complaint (including depression, anxiety, sleep disturbances, suicide, self-harm, compulsive use, and addiction), including but not limited to Communications between Plaintiff and any Minnesota citizens, voters, consumers, or their relatives. This includes any Documents Relating to town hall events hosted by Plaintiff to discuss Social Media Platforms and other technology affecting Young Users.

Response: Not applicable. MNDHS has no formal process for receiving consumer complaints or formal function relating to this subject matter. To the extent this request asks MNDHS to search all documents in the possession of its thousands of employees for documents MNDHS incidentally possesses relating to this subject matter, MNDHS objects that the request is unduly burdensome and disproportionate to the needs of the case and will not conduct such a search.

Request No. 12: All Communications between Plaintiff and any media source Relating to Young Users' use of Social Media Platforms, Young Users' Mental Health and Wellbeing, and/or any of the conduct and harms alleged in the Complaint (including depression, anxiety, sleep disturbances, suicide, self-harm, compulsive use, and addiction). This includes but is not limited to transcripts from television, radio, Social Media Platforms, and podcast interviews.

Response: This request is encompassed by Subpoena Request 17. MNDHS incorporates its responses and objections to that request here.

Request No. 13: All Documents Relating to meetings, presentations, or proposals Related to the awareness of, the alleged abuse of, use of, misuse of, and/or alleged addiction to Social Media Platforms by Young Users.

Response: This request is encompassed by Subpoena Request 6, 14, and 16. MNDHS incorporates its responses and objections to those requests here.

Request No. 14: All minutes, agendas, notes, and other records, including audio and/or visual recordings, of or from any public or non-public meeting Relating to Young Users' use of Social Media Platforms, Young Users' Mental Health and Wellbeing, and/or any of the conduct and harms alleged in the Complaint (including depression, anxiety, sleep disturbances, suicide, self-harm, compulsive use, and addiction).

Response: This request is encompassed by Subpoena Request 6, 14, and 16. MNDHS incorporates its responses and objections to those requests here.

Request No. 15: All Documents Relating to Communications with any Defendant in this case (excluding court Documents filed or served in this case) Relating to Young Users' use of Social Media Platforms, Young Users' Mental Health and Wellbeing, and/or any of the conduct and harms alleged in the Complaint (including depression, anxiety, sleep disturbances, suicide, self-harm, compulsive use, and addiction).

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Response: This request is encompassed by Subpoena Request 16 and 17. MNDHS incorporates its responses and objections to those requests here.

Request No. 16: All Documents Relating to Communications with any company owning or operating a Social Media Platform Relating to Young Users' use of Social Media Platforms, Young Users' Mental Health and Wellbeing, and/or any of the conduct and harms alleged in the Complaint (including depression, anxiety, sleep disturbances, suicide, self-harm, compulsive use, and addiction).

Response: This request is encompassed by Subpoena Request 16 and 17. MNDHS incorporates its responses and objections to those requests here.

Request No. 17: All Documents Relating to Plaintiff's efforts to prevent Young Users from using any Social Media Platform.

Response: his request is encompassed by Subpoena Request 6, 11, and 18. MNDHS incorporates its responses and objections to those requests here.

Request No. 18: All Documents Relating to Plaintiff's efforts to encourage or promote the use of Social Media Platforms, including but not limited to the use of Social Media Platforms by Young Users.

Response: This request is encompassed by Subpoena Request 2, 6, and 21. MNDHS incorporates its responses and objections to those requests here.

Request No. 19: All Documents Relating to Plaintiff's efforts to suspend, revoke, fine, or otherwise sanction Defendants or any other company owning or operating a Social Media Platform.

Response: Not applicable. MNDHS is not aware of any enforcement action taken against a Social Media Platform.

Request No. 20: All Documents Relating to any proposed legislation or proposed policies, regardless of whether such legislation or policies were passed, regarding Young Users' use of Social Media Platforms or Young Users' Mental Health and Wellbeing.

Response: This request is encompassed by Subpoena Request 11. MNDHS incorporates its responses and objections to that request here.

Request No. 21: All Documents that Plaintiff contends show Defendants possessed knowledge of material facts to which the public did not have access, as alleged in Plaintiff's Complaint.

Response: Not applicable. MNDHS has not made any allegations in this lawsuit.

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Request No. 22: All Documents Relating to Defendants' knowledge of the truth or falsity of any representation by Defendants that Plaintiff contends is false or misleading.

Response: Not applicable. MNDHS has not made any allegations in this lawsuit.

Request No. 23: All Documents Relating to the extent to which Minnesota residents received any representation by Defendants that Plaintiff contends is false or misleading.

Response: Not applicable. MNDHS has not made any allegations in this lawsuit.

Request No. 24: All Documents Relating to the extent to which Minnesota residents relied on any representation by Defendants that Plaintiff contends is false or misleading.

Response: Not applicable. MNDHS has not made any allegations in this lawsuit.

Request No. 25: All Documents Relating to the investigation referenced in paragraph 842 of the Complaint, including but not limited to transcripts of interviews and affidavits and declarations of witnesses.

Response: Not applicable. MNDHS was not involved in any alleged investigation.

Request No. 26: All Documents Relating to research, testing, study, investigation, or any other efforts undertaken by Plaintiff or any Person or group acting on behalf of Plaintiff Relating to Young Users' use of Social Media Platforms, Young Users' Mental Health and Wellbeing, and/or any of the conduct and harms alleged in the Complaint (including depression, anxiety, sleep disturbances, suicide, self-harm, compulsive use, and addiction).

Response: This request is encompassed by Subpoena Request 1, 2, 3, and 5. MNDHS incorporates its responses and objections to those requests here.

Request No. 27: All Documents Plaintiff has received from a third party Relating to this action or any investigation by Plaintiff Relating to the conduct and harms alleged in the Complaint (including depression, anxiety, sleep disturbances, suicide, self-harm, compulsive use, and addiction).

Response: Not applicable. MNDHS was not involved in any investigation related to this lawsuit and has not received third party documents related to this lawsuit.

Request No. 28: All Documents Related to programs, initiatives, or actions proposed or taken by Plaintiff or any other government entity to address Young Users' use of Social Media Platforms, Young Users' Mental Health and Wellbeing, and/or the conduct and harms alleged in the Complaint (including depression, anxiety, sleep disturbances, suicide, self-harm, compulsive use, and addiction).

Response: This request is encompassed by Subpoena Request 1, 2, 3, 5, 6, 11, 13, 14, and 16. MNDHS incorporates its responses and objections to those requests here.

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Request No. 29: All Documents Relating to the U.S. Surgeon General’s May 2023 Advisory entitled “Social Media and Youth Mental Health.”

Response: To the extent not encompassed by the Subpoena Requests, MNDHS objects to this request as overbroad and unduly burdensome.

Subject to and without waiving the foregoing objections and the general objections set forth in its responses and objections to the Subpoena, MNDHS states that will produce public policies or statements issued by or on behalf of MNDHS related to this advisory, if any, located in a reasonable search.

Request No. 30: All Documents Relating to the movie referenced in paragraph 420 of the Complaint.

Response: Not applicable. MNDHS was not involved in preparing the Complaint and has not made allegations in this lawsuit. MNDHS is also unable to provide a response to this request because Paragraph 420 is redacted on the public docket and MNDHS does not have access to the unredacted version of the Complaint.

Request No. 31: All Documents, including but not limited to reports, studies, surveys, and articles, relating to the causes or contributing factors to Young Users’ Mental Health and Wellbeing issues, including causes other than the use of Social Media Platforms.

Response: This request is encompassed by Subpoena Request 1, 2, 3, 5, and 6. MNDHS incorporates its responses and objections to those requests here.

Request No. 32: All Documents, including but not limited to reports, studies, surveys, and articles, relating to time spent by Young Users on Social Media Platforms.

Response: This request is encompassed by Subpoena Request 1, 2, 3, 5, and 6. MNDHS incorporates its responses and objections to those requests here.

Request No. 33: All Documents, including but not limited to reports, studies, surveys, and articles, relating to the causes or contributing factors to Young Users’ use of Social Media Platforms.

Response: This request is encompassed by Subpoena Request 1, 2, 3, 5, and 6. MNDHS incorporates its responses and objections to those requests here.

Request No. 34: All Documents, including but not limited to reports, studies, surveys, and articles, Relating to the impact of video games, cell phone usage, messaging, and other electronics usage apart from usage of Social Media Platforms on Young Users’ Mental Health and Wellbeing.

Response: This request is encompassed by Subpoena Request 1, 2, 3, 5, 6 and 7. MNDHS incorporates its responses and objections to those requests here.

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Request No. 35: All Documents, including but not limited to reports, studies, surveys, and articles, Relating to the impact of the COVID-19 pandemic and/or remote learning on Young Users' Mental Health and Wellbeing.

Response: This request is encompassed by Subpoena Request 1, 2, 3, 5, 6, 7 and 8. MNDHS incorporates its responses and objections to those requests here.

Request No. 36: All Documents, including but not limited to reports, studies, surveys, and articles, Relating to the impact of social, economic, and political issues and/or factors on Young Users' Mental Health and Wellbeing.

Response: This request is encompassed by Subpoena Request 1, 2, 3, 5, and 6. MNDHS incorporates its responses and objections to those requests here.

Request No. 37: All Documents, including but not limited to reports, studies, surveys, and articles, relating to the allegation that addiction to Social Media Platforms is a recognized medical condition.

Response: This request is encompassed by Subpoena Request 1, 2, 3, 5, and 6. MNDHS incorporates its responses and objections to those requests here.

Request No. 38: All Documents Relating to the features of Defendants' Platforms identified in the Complaint, including "push notifications," "algorithmic recommendation and sequencing," "public display and quantification of engagement metrics such as Likes," "ephemeral presentation of social content," "infinite scroll," "autoplay formats," "audiovisual and haptic alerts," "permitting and encouraging users to create multiple accounts," and "face and body image manipulation filters."

Response: This request is encompassed by Subpoena Request 5. MNDHS incorporates its responses and objections to that request here.

Request No. 39: All Documents, including but not limited to reports, studies, surveys, and articles, Relating to any impact that the features of Defendants' Platforms identified in the Complaint, including "algorithmic recommendation and sequencing," "public display and quantification of engagement metrics such as Likes," "push notifications," "ephemeral presentation of social content," "infinite scroll," "autoplay formats," "audiovisual and haptic alerts," "permitting and encouraging users to create multiple accounts," and "face and body image manipulation filters," have on Young Users' Mental Health and Wellbeing.

Response: This request is encompassed by Subpoena Request 5. MNDHS incorporates its responses and objections to that request here.

Request No. 40: All Documents, including but not limited to reports, studies, surveys, and articles, relating to the value or benefits of Social Media Platforms, including but not limited to the value or benefits for Young Users.

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Response: This request is encompassed by Subpoena Request 2 and 6. MNDHS incorporates its responses and objections to those requests here.

Request No. 41: All Documents Relating to the investigation by Plaintiff into operators of Social Media Platforms, other than Defendants' Platforms, for possible violation of Minnesota's consumer protection laws, including but not limited to any Communications or statements made about such investigation, and the results or conclusions reached from the investigation.

Response: Not applicable. MNDHS was not involved in any investigation related to this lawsuit.

Request No. 42: All Documents that Plaintiff contends support a causal connection between Young Users' use of Social Media Platforms and Young Users' Mental Health and Wellbeing, and/or the harms alleged in the Complaint (including depression, anxiety, sleep disturbances, suicide, self harm, compulsive use, and addiction).

Response: Not applicable. MNDHS is not a party to this suit and does not know what documents support Plaintiff's contentions.

Request No. 43: All Documents Relating to the relief Plaintiff seeks from Defendants in this action, including any calculations, formulas, methodologies, or estimates thereof (even if preliminary or partial).

Response: Not applicable. MNDHS has not made any allegations in this lawsuit and is not seeking relief in this lawsuit.

Request No. 44: All final, approved budgets from the State of Minnesota for fiscal years from January 1, 2015 to the present.

Response: To the extent this request is encompassed by Subpoena Request 18, 19, and 22, MNDHS incorporates its responses and objections to those requests here. MNDHS objects to searching for and producing "final, approved budgets from the State of Minnesota" as overbroad and unduly burdensome.

Request No. 45: All Documents Related to any requested or approved budgets and/or fiscal expenditures to address Young Users' Mental Health issues and/or Young Users' use of Social Media Platforms or any harms allegedly caused from such use.

Response: This request is encompassed by Subpoena Request 18, 19, and 22. MNDHS incorporates its responses and objections to those requests here.

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Request No. 1: All documents related to the expenditures of Minnesota's \$93 million funding package for mental health.

Response: This request appears largely encompassed by Subpoena Request 18, 19, and 22, and MNDHS incorporates its responses and objections to those requests here. To the extent it is not encompassed by those requests, MNDHS objects to this request as vague and unduly burdensome.

Request No. 2: All documents related to Minnesota Department of Human Services Mental Health Innovation: White Earth Mental Health grants, including information about when, where, why, and how any disbursements were paid, any schedules or plans for future disbursements, policies governing evaluation or approval of such disbursements, records of how the disbursements were used, and all agendas, minutes, notes, or recordings from meetings Minnesota Department of Human Services Mental Health Innovation Grant Program

Response: This request is encompassed by Subpoena Request 13. MNDHS incorporates its responses and objections to that request here.

Request No. 3: All documents related to Minnesota Department of Health ORHPC: Mental Health Safety Net grants, including information about when, where, why, and how any disbursements were paid, any schedules or plans for future disbursements, policies governing evaluation or approval of such disbursements, records of how the disbursements were used, and all agendas, minutes, notes, or recordings from meetings related to Minnesota Department of Health.

Response: Not applicable to MNDHS.

Request No. 4: All documents related to Minnesota Department of Health ORHPC: Pediatric Primary Care Mental Health Training Grant Program, including information about when, where, why, and how any disbursements were paid, any schedules or plans for future disbursements, policies governing evaluation or approval of such disbursements, records of how the disbursements were used, and all agendas, minutes, notes, or recordings from meetings related to Minnesota Department of Health.

Response: Not applicable to MNDHS.

Request No. 5: All documents, including but not limited to reports, studies, communications, meeting minutes and/or notes, surveys, and articles relating to, and documents relied on to draft Minnesota House Bill 1503, and documents and information about why the Bill was not enacted.

Response: Not applicable to MNDHS.

Request No. 6: All documents, including but not limited to reports, studies, communications, meeting minutes and/or notes, surveys, and articles relating to, and documents relied on to draft Minnesota House Bill 2810.

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Response: Not applicable to MNDHS.

Please contact us if you have any questions regarding the above. Thank you.

Sincerely,

/s/ Aaron Winter

AARON WINTER

Assistant Attorney General

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Attorneys for Department of Human Services

From: [Aaron Winter](#)
To: [Zalazar, Santiago](#); [Caitlin Micko](#); [Jason Pleggenkuhle](#)
Cc: [Jacob Harris](#); [Bradley Simon](#); [Kelly Kemp](#); [Joseph Weiner](#); [Stephen Melchionne](#); [Janine Kimble](#); [Patel, Mona](#); [Yeung, Christopher](#); [DeBoy, John](#); [Yu, Janna](#); [Ogden, Jessica G](#); [James, Khala](#)
Subject: RE: Meta Litigation - Minnesota State Agency discovery
Date: Friday, December 6, 2024 4:17:36 PM
Attachments: [image002.png](#)
[image003.png](#)

Dear Santiago,

On behalf of MNDHS, I write to respond to your December 4 email regarding the meet-and-confer.

Thank you for clarifying the three specific pieces of information Meta is seeking from MNDHS. We disagree that none of this information was provided during the call. MNDHS summarized generally the instructions that were given to the BHA staff who collected document and pointed to its November 20 letter for more detail about those instructions. MNDHS also confirmed *twice* during the call that it searched the relevant time period identified in the subpoena (MNDHS also reiterated—as explained in its original objection to the subpoena and the parties’ subsequent meet-and-confer—that any collection would be subject to MNDHS regular retention policies that were in place before the subpoena was issued and litigation holds were imposed). The parties’ initial agreement limited the scope of the subpoena to responsive documents and information that were in some way generated, commissioned, initiated, or originated with MNDHS. Meta also agreed that it was not interested in documents relating to specific patients. The search described in our November 20 letter was for any such documents that relate to the categories of information requested in the subpoena, subject to the limitations discussed in August. Further, MNDHS is willing to provide the names and titles of the MNDHS employees responsible for searching. That list appears at the end of this email.

To the extent there is a dispute between Meta and MNDHS at this point, it appears limited to Meta’s request that MNDHS provide search terms, custodians, and hit reports because Meta believes every state agency is required by court order to respond to the subpoena (or its Rule 34 requests) with such an ESI search protocol. That is plainly incorrect. Judge Kang’s order on the subject (Dkt. 1380) states that agencies like MNDHS that “collected documents for production using some other process” than search terms and hit count reports must “disclose transparently the processes used to locate responsive documents.” MNDHS’ November 20 letter did that, and this email continues to answer Meta’s questions on the subject. MNDHS notes further that the use of search terms would be particularly onerous for DHS given the volume of protected information that DHS handles that would need to be screened out or redacted.

Judge Kang’s order and his comments at the November 21 hearing place obligations on Meta to act reasonably and negotiate regarding any gaps in production it believes exist; to date, Meta has been unwilling to do so, instead apparently regarding meet-and-confers as a one-

way flow of information from MNDHS to Meta. If Meta believes that MNDHS' production is deficient in some way, please let us know your availability for a call next week on Monday or Tuesday. In order to have a meaningful and productive discussion, we request that: (1) the meet-and-confer include counsel for Meta with full authority to resolve remaining disputes; (2) Meta have fully reviewed MNDHS's document production before the meet-and-confer; (3) Meta be prepared to identify specific shortcomings in MNDHS's production of documents that Meta believes must be cured so that MNDHS knows what Meta is asking it to do; and (4) Meta be prepared to otherwise answer the questions MNDHS posed on the second page of its December 2 letter, to which MNDHS has still received no response despite Meta's promise on Tuesday to respond as soon as possible.

Here is list of the individuals responsible for MNDHS search/collection. This list does not include any agency or litigation counsel:

BHA:

Kristine Preston, Deputy Assistant Commissioner
Teresa Steinmetz, Assistant Commissioner
Eric Grumdahl, Assistant Commissioner
Sara Rose, Chief Administrative Officer
James Thompson, Operations Data Practices and Compliance Specialist
Barbie Hess, Executive Assistant
Jen Sather, Director Substance Use Disorder Services
Kim Maley, Manager of SUD Recovery and Prevention Services
EJ Dean, Manager of Adult Mental Health Programs & Services
Lisa Blacker, Data Teams Manager
Diane Neal, Director Mental Health Services

HCA:

Julie Marquardt, Deputy Assistant Commissioner and Assistant Medicaid Director
Diogo Reis, Health Improvement and Benefit Design Division Director
Justine Nelson, Research Scientist

ADS:

Colin Stemper, Director and Chief Administrative Officer for ADS Operations and Central Functions
Natasha Merz, Assistant Commissioner

DCYF:

Bharti Wahi, Interim Assistant Commissioner of DCYF Child Safety and Permanency
Marvin Davis, Deputy Director of DYCF Child Safety and Permanency
Yvonne Goodsky, Deputy Director of DYCF Child Safety and Permanency
Jennifer Sommerfeld, DCYF Government Relations Director

DHS Communications:

Greta Bergstrom, DHS Communications Director
Sarah Berg, DHS Central Media Communications Manager
Martiga Lohn, DHS Central Media Administrative Officer
Jon Wittman, DHS Program Area Communications Manager
Lisa Wilder, DHS Agency Communications

Human Resources:

Mary Buss, DHS Human Resources Manager
Zong Thao, DHS Strategic Solutions Supervisor
Roger Ehresmann, DHS Management Operations for Agency Effectiveness – Finance
Sarah Orange, DHS Deputy Chief Finance Officer for Agency Effectiveness - Finance
Joe Jarosz, DHS Accounting Operations Manager for Agency Effectiveness – Finance
Mike Lavallo, DHS Procurement and Acquisitions Manager for Agency Effectiveness – Finance

Direct Care and Treatment:

Dr. KyleeAnn Stevens, Executive Medical Director for Behavioral Health
Teri Peterson, Director of Central Preadmissions
Wade Brost, Executive Director of Mental Health and Substance Abuse Treatment Services
Dr. Maria Harmandayan, Medical Director of Mental Health and Substance Abuse Treatment Services
Kaye Zarn Mills, DCT Director of Policy
Katie Miller, DCT Policy Coordinator
Mindy Rogers, Director of Health, Safety & Policy Quality
Jordan Collins, Policy Coordinator – Mental Health and Substance Abuse Treatment Services
Allan Pendergrass, Policy Coordinator – Community Based Services and Ambulatory Services
Jan Jensen, Policy Coordinator – Forensic Services
Dave Bornus, Policy Coordinator – Minnesota Sex Offender Program
Scott Melby, Chief Operations Officer – Forensic Services
Katie Endresen, DCT Health Information Management Supervisor

Thank you,

Aaron

From: Zalazar, Santiago <SZalazar@cov.com>

Sent: Wednesday, December 4, 2024 1:20 PM

To: Caitlin Micko <Caitlin.Micko@ag.state.mn.us>; Jason Pleggenkuhle
<Jason.Pleggenkuhle@ag.state.mn.us>

Cc: Aaron Winter <Aaron.Winter@ag.state.mn.us>; Jacob Harris <Jacob.Harris@ag.state.mn.us>;
Bradley Simon <Bradley.Simon@ag.state.mn.us>; Kelly Kemp <Kelly.Kemp@ag.state.mn.us>; Joseph
Weiner <Joseph.Weiner@ag.state.mn.us>; Stephen Melchionne
<Stephen.Melchionne@ag.state.mn.us>; Janine Kimble <Janine.Kimble@ag.state.mn.us>; Patel,

Mona <mpatel@cov.com>; Yeung, Christopher <cyeung@cov.com>; DeBoy, John <jdeboy@cov.com>; Yu, Janna <JYu@cov.com>; Ogden, Jessica G <JOgden@cov.com>; James, Khala <KJames@cov.com>

Subject: RE: Meta Litigation - Minnesota State Agency discovery

Importance: High

Dear Caitlin and Jason,

Thank you for the productive call.

It was good to meet counsel for the various non-subpoenaed state agencies for the first time. We understand that Solicitor General Kramer (whom I have BCC'd in this email, for visibility) will no longer be representing these agencies. We were sorry to hear that counsel from the Department of Commerce ("DoC") was unable to join, but we are in receipt of the e-mail that he sent shortly before we met (attached).

Consistent with Judge Kang's order that "the Parties ... engage in prompt and transparent negotiations for purposes of identifying reasonable search terms and custodians and exchanging hit reports," *see* ECF No. 1380 at 2-3, during our call, Meta requested an update on the Minnesota state agencies' efforts to comply with their court obligations, discussed next steps with those agencies that had run Meta's revised proposed search terms, and, for those agencies that had already collected documents, posed basic questions regarding the processes used to locate responsive documents. Below is Meta's understanding of the Parties' discussions.

Office of the Governor

Meta shared numerous examples of publicly available information it found through simple Google searches to show that the agency is likely to have additional responsive documents, other than the three files it has produced.

Following a discussion of the description that Minnesota provided regarding the efforts undertaken by the Office of the Governor to locate relevant documents, as described in your November 27 letter (attached), counsel for this agency agreed to follow up by today, December 4, regarding the agency's commitment to provide the following information:

- Names and roles of the "staff [identified] whose work overlaps with the subject of the discovery," as well as the names and roles of the individuals of the "office's head of policy and the policy staff responsible for covering mental health, children, schools, and human services," all of whom were asked if "they had any data relating to children's mental health and social media."
- Description of the agency's document retention policies.
- The instructions/search terms/keywords used to locate responsive documents.
- The time period covered.

Meta considers the relevant time period to be the same as the one that the AGs insisted apply to Meta: January 1, 2012-April 1, 2024.

Office of Higher Education ("OHE")

Following a discussion of the description that Minnesota provided regarding the efforts

undertaken by OHE to locate relevant documents, as described in your November 27 letter, counsel for this agency agreed to follow up by today regarding the agency's commitment to provide the following information:

- Names and roles of the OHE division managers and the staff consulted or believed to have "documents or communications relating to young users' use of social media platforms and related harms."
- The instructions/search terms/keywords used to locate responsive documents.
- The time period covered.

Meta is considering deprioritizing this agency.

Department of Human Services (DHS)

Following a discussion of the description that DHS provided regarding the efforts undertaken to locate relevant documents, as described in DHS's November 20 letter (attached), Meta asked DHS counsel to provide or confirm (i) the names and the roles of the individuals consulted or believed to have responsive documents (*e.g.*, "program area leaders [contacted] to gather information and collect MNDHS-generated documents and information related to teen mental health or social media use"; "the [Behavioral Health Administration] staff member[s] [instructed] to search for and provide any responsive documents in their personal network drives and emails"; etc.), (ii) the instructions DHS counsel mentioned that were used, and (iii) the time period covered. Meta is requesting this information so that it can verify the procedures DHS used to identify relevant documents, and hopefully confirm that letter briefing will not be required with respect to DHS's efforts to comply with the court's order. Meta has requested and received this basic information from numerous state agencies without issue.

Notwithstanding Meta's explanations that this basic information is needed to determine the adequacy of the searches DHS conducted, DHS refused to provide any of the requested information. Surprisingly, DHS appeared to suggest that the agency would not comply with its court obligations unless Meta provided responses to the eleventh-hour, 12-page letter DHS sent Meta the night before the Parties' meeting (attached).

Minnesota Department of Health ("MDH")

Following a discussion of the description that Minnesota provided regarding the efforts undertaken by MDH to locate relevant documents, as described by your November 27 letter and MDH's December 3 email (attached), counsel for this agency agreed to—and in a subsequent email (attached) did—confirm that the time period covered by MDH started on January 1, 2012. Meta is not seeking additional information from MDH at this time. Meta reserves all rights.

Minnesota Management and Budget ("MMB")

Following a discussion of the hit-count results included in your December 3 email (attached), counsel for MMB agreed to provide a counterproposal to Meta's proposed revised search terms by today.

Department of Employment and Economic Development ("DEED")

Following a discussion of the hit-count results included in your December 3 email

(attached), counsel for DEED agreed to provide a counterproposal to Meta's proposed revised search terms, as well as the agency's document retention policies, by today. Meta agreed to consider deprioritizing this agency.

Department of Education ("MDE")

Following a discussion of the description that MDE provided regarding the efforts undertaken to locate relevant documents, as described in MDE's November 20 letter (attached), counsel for this agency agreed to follow up by today regarding the agency's commitment to provide the following information:

- Names and roles of the "subject matter experts" MDE identified.
- The instructions/search terms/keywords used to locate responsive documents.
- The time period covered.

Department of Commerce

Please provide the names of the "heads of the units within Commerce [that counsel consulted] to determine if they have any responsive documents" during the "broad initial search[]" [DoC conducted] to determine where it may have documents referencing Meta or Facebook," as outlined in Minnesota's November 27 letter and DoC's December 3 email. Additionally, given that DoC appears to have omitted to run highly relevant terms (*e.g.*, "Instagram"), please provide the instructions used. Meta is considering deprioritizing this agency.

Please let us know your availability for another conferral. Otherwise, we will have to exchange letter briefs by Friday (December 6) for submission to the Court on Monday (December 9).

Thank you.

Santiago M. Zalazar

Santiago Zalazar

Pronouns: He/Him/His

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From: Caitlin Micko <Caitlin.Micko@ag.state.mn.us>

Sent: Tuesday, December 3, 2024 4:41 PM

To: Zalazar, Santiago <SZalazar@cov.com>; Patel, Mona <mpatel@cov.com>; Yu, Janna <JYu@cov.com>

Cc: Jason Pleggenkuhle <Jason.Pleggenkuhle@ag.state.mn.us>; Aaron Winter <Aaron.Winter@ag.state.mn.us>; Jacob Harris <Jacob.Harris@ag.state.mn.us>; Bradley Simon <Bradley.Simon@ag.state.mn.us>; Kelly Kemp <Kelly.Kemp@ag.state.mn.us>; Joseph Weiner <Joseph.Weiner@ag.state.mn.us>; Stephen Melchionne <Stephen.Melchionne@ag.state.mn.us>; Janine Kimble <Janine.Kimble@ag.state.mn.us>

Subject: Meta Litigation - Minnesota State Agency discovery

[EXTERNAL]

Santiago, Janna, and Mona:

Thank you for the call today. As I mentioned, Solicitor General Liz Kramer has had to step back from state agency representation in this case due to unrelated matters. The attorneys representing the state agencies are listed below and copied on this email:

Department of Human Services – Aaron Winter and Jacob Harris
Department of Health – Brad Simon and Kelly Kemp
Department of Education – Joe Weiner
Office of Higher Education – Joe Weiner
Department of Commerce – Steve Melchionne
Minnesota Management & Budget – Janine Kimble
Governor's Office – Janine Kimble
Department of Employment and Economic Development – Kelly Kemp and Brad Simon

Jason Pleggenkuhle and I continue to represent the Plaintiff in this case. Please copy us on all correspondence with the state agency attorneys.

Thank you,
Caitlin



Caitlin Micko *(she/her)*

Assistant Attorney General | Consumer Protection Division

Office of the Minnesota Attorney General

445 Minnesota Street, Suite 600, Saint Paul, MN 55101

Office: 651-724-9180 | Website: ag.state.mn.us

Helping people afford their lives and live with dignity, safety, and respect

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Minnesota Attorney General Keith Ellison
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December 16, 2024

Via email only

COVINGTON & BURLING LLP

Santiago Zalazar – szalazar@cov.com

**Re: Meta Subpoena to MNDHS in *In re: Social Media Adolescent
Addiction/Personal Injury Products Liability Litigation*
N.D. Cal. Case No. 4:22-md-03047-YGR**

Dear Santiago,

As directed by Magistrate Judge Kang and discussed on this morning's call, we write to provide search term hit reports and proposed search terms for Diane Neal, MNDHS Behavioral Health Administration Director of Mental Health. MNDHS is in the process of identifying ESI custodians based on the list of staff we circulated on December 6 and will update Meta soon.

Attached is a hit report for the November 22, 2024 search terms proposed by Meta. The search resulted in 31,902 hits, 36,427 with families included—more than half of Ms. Neal's entire PST. This search is far too broad.

Below is an alternative set of search terms that includes the non-social-media potential causes of teen mental health issues, terms that limit the results to research, investigations, programs, etc. that originate from or initiated by MNDHS, and age-related limiting terms proposed by Meta in its November 22 proposal. We believe these terms are appropriately tailored to the information Meta seeks from MNDHS, and appropriately omits false-positive hits. In essence, and consistent with our discussion this morning, we intend this search to locate MNDHS research, policies, or programs that involve the conjunction of alleged or potential social media and non-social media causes of mental health issues experienced by young people:

- ("Department of Human Services") AND
- ("Social Media" OR Facebook Instagram Meta OR "video game*" OR "cell phone*" OR "mobile phone*" OR "smart phone*" OR "text message*" OR messaging electronic* OR COVID-19 OR "remote learning" OR drugs alcohol* OR "opioid*" OR "fentanyl" OR poverty OR homelessness OR "health insurance" OR "food insecurity" OR "physical health" OR nutrition OR exercise OR "weight management" OR "Sexual activity" OR "death in the family" OR "domestic abuse" OR "academic pressure" OR "gun violence" OR "school violence" OR "mass shooting*" OR bully*

Santiago Salazar, et al.

December 16, 2024

Page 2 of 2

- OR “verbal abuse” OR politics OR “political polarization” OR “natural disaster*” OR “climate change” OR “racial discrimination” OR “sex discrimination” OR “gender discrimination” OR “religious discrimination” OR “global warfare” OR “global conflict”) *within 10 words of*
- (Abuse OR Addiction OR Anxiety OR Compulsive OR Depression OR Effects OR Harm OR "Mental Health" OR Misuse OR Prevent OR Promote OR Psychological OR Report OR Sleep OR Suicide OR trauma OR Wellbeing OR) *within 10 words of*
 - (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR U18 OR “under 18” OR U13 OR “gen* z” OR “gen-z” OR “gen* alpha” OR “gen-a” OR scholar* OR school* OR student* OR pupil* OR grade*) *within 10 words of*
 - (research OR investigation* OR study OR studies OR report OR reports* OR evaluation* OR analysis OR analyses OR program* OR initiative* OR effort* OR policies OR policy)

Attached is a hit report for this search, which provided 80 hits, and 209 with families included. Regarding those numbers, please note our internal QA suggests that the search may hit on some documents that do not contain a term from each of the last four bullet point “buckets” above. If so, that is contrary to what MNDHS intends the search to accomplish. We intend to raise the issue with Everlaw support tomorrow and will update Meta as soon as possible, but wanted to provide our best information right away.

Finally, please provide Meta’s DHS-specific search proposal as soon as possible.

Thank you,

/s/ Aaron Winter

AARON WINTER

Assistant Attorney General

MN Bar No. 0390914

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JACOB HARRIS

Assistant Attorney General

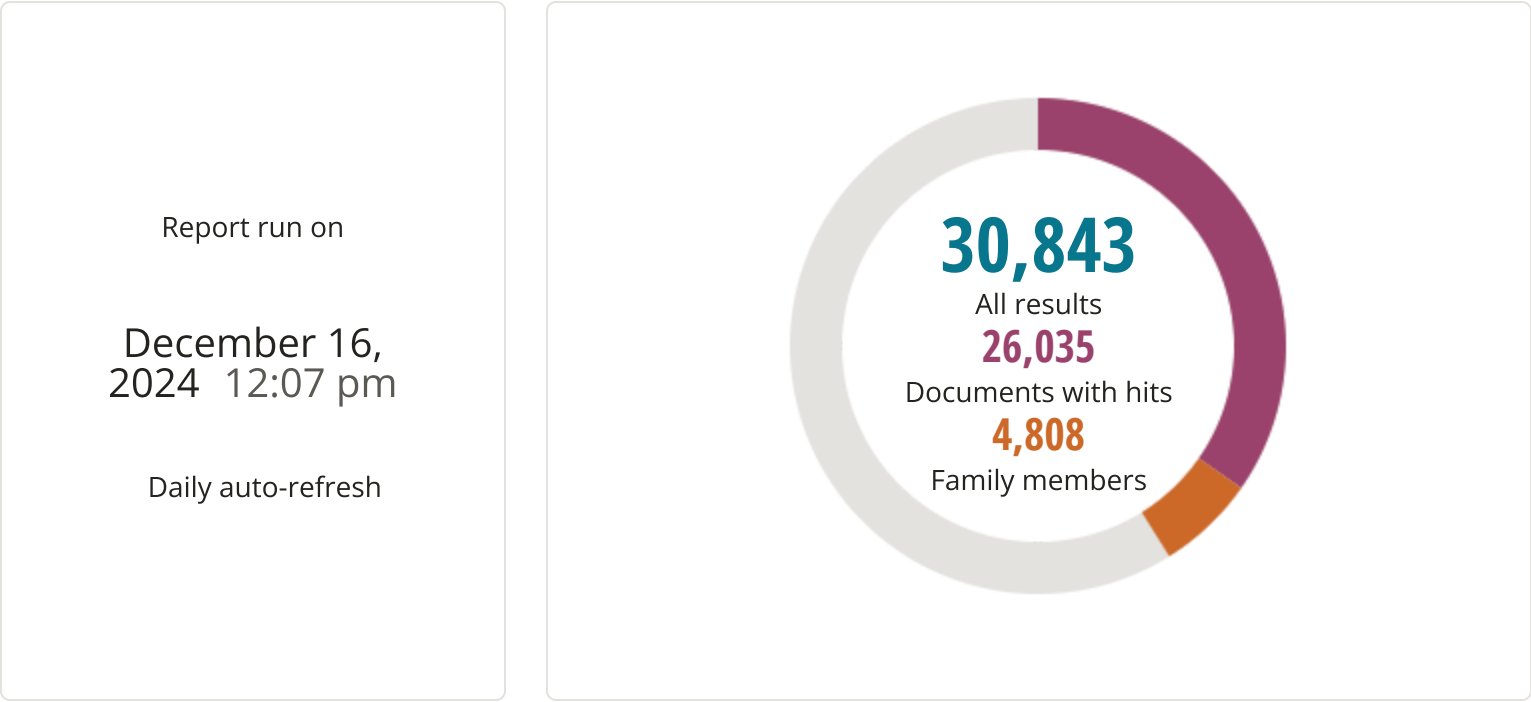
MN Bar No. 0399255

(651) 757-1156 (Voice)

jacob.harris@ag.state.mn.us

Attorneys for Department of Human Services

Meta Terms



<div>75,013</div> <div>in Searchable Set + Attachments</div>	<div>Searchable Set</div> <div>Dataset Jeff Plaman PST and All Date Fields from 2012/01/01 to 2024/12/16 (CST)</div>
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Search term document hits

Search	Documents with hits	Documents exclusive to search	Documents with hits (including attachment family members)	

("social media" OR "social network" OR Meta OR Facebook OR Instagram OR "Insta" OR Youtube OR Snapchat OR Snap OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest OR Tumblr OR telegram OR signal OR viber OR threema OR wechat OR kik OR textplus OR wickr OR troop OR YikYak OR "Yik Yak" OR finsta OR FB OR IG OR YT OR TT OR DM* OR "direct message")	5,159	1,597	7,352	
(wellness OR wellbeing OR well-being OR confidence OR self-confidence OR "mental health" OR "TMH" OR "ACE*" OR "adverse childhood experience" OR anxi* OR anti-anxi* OR depress* OR antidepress* OR sad* OR reclus* OR stress OR "attention deficit" OR "ADHD" OR posttraumatic OR "bi-polar" OR "bi polar" OR bipolar OR "BPD" OR insomnia OR scar* OR afraid OR angry OR mad OR worr* OR lonel* OR alone OR therap* OR counsel* OR treatment*)	6,916	1,456	10,291	
("pro-ana" OR "BMI" OR overweight OR fat OR obes* OR diet* OR anorexi* OR bulimi* OR orthorexi* OR appetite OR dysmorph* OR binge OR purge OR suicid* OR "self harm" OR "self-harm" OR selfharm OR unalive OR cutting*)	1,257	458	2,384	
(bully* OR bullie* OR cyberbull* OR harass* OR sextort* OR transphob* OR homophob* OR racis* OR sexis* OR groom* OR hookup* OR solicit* OR pedophil* OR predator* OR sex* OR extort OR exploit*)	1,853	204	3,752	

(violen* OR abus* OR assault* OR fight* OR altercation OR misbehav* OR misconduct* OR shoot* OR shot OR threat* OR gun* OR pistol OR rifle OR firearm OR rape* OR murder* OR traff* OR hate*)	2,559	335	4,424	
(addic* OR hook* OR dopamine OR rabbithol* OR spiral OR "social reward" OR "social approval" OR "screen time" OR screentime staytime OR timespent OR "time spent" OR "engagement" OR impression* OR "monthly active users" OR "daily active users" OR "monthly active people" OR "daily active people" OR "weekly active users" OR "mandatory break" OR "limiting tool" OR "habit loop" OR "operant conditioning" OR "impulse control")	4,043	759	6,664	
("eat* (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*)"~3)	194	0	577	
("sleep* (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*)"~3)	11	0	34	
("negative (appearance OR experience OR affect* OR effect*)"~3)	130	1	461	
("compar* (appearance OR social OR other* OR negative)"~5)	512	26	1,438	
("body (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*)"~3)	48	0	222	
("self (esteem OR harm OR control OR injur* OR mutilat* OR regulat*)"~3)	421	8	1,174	

(Covid* OR coronavirus OR pandemic OR lockdown OR "lock* down" OR quarantine OR "social* distanc*")	3,674	884	4,643	
(svap* OR "ecig" OR "e-cig" OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent* OR opio* OR opia* OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller* OR narcotic* OR drug* OR alcohol* OR Juul)	906	107	2,326	
(practice* OR presentation OR assembl* OR initiative* OR interven* OR prevent* OR limit* OR control* OR legislation OR advocacy OR lobby* OR legislat* OR law OR suspend* OR revok* OR fine* OR sanction* OR cancel* OR abandon* OR ban OR banned OR banning OR concern* OR problematic OR investigat* OR criminal OR charges OR conviction* OR arrest* OR "law enforcement" OR deceptive OR decei* OR fraud* OR defraud* OR cheat* OR misrepresent* OR mislead* OR schem* OR exploit* OR trick* OR conceal* OR hide OR omit* OR downplay* OR suppress* OR "cover up" OR "Consumer Protection Act" OR "consumer protection") AND (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR gen-a* OR scholar* OR School* OR student* OR pupil* OR grade*)	19,041	9,735	23,721	

Revised Terms

Report run on

December 16,
2024 2:26 pm

Daily auto-refresh

Category	Count
All results	3,503
Documents with hits	2,224
Family members	1,279

<div>75,013</div> <div>in Searchable Set + Attachments</div>	<div>Searchable Set</div> <div>Dataset Jeff Plaman PST and All Date Fields from 2012/01/01 to 2024/12/16 (CST)</div>
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Search term document hits

Search	Documents with hits	Documents exclusive to search	Documents with hits (including attachment family members)	

("Social Media" OR Facebook OR Instagram OR "Meta") AND (Abuse OR Addiction OR Anxiety OR Compulsive OR Depression OR Effects OR Harm OR "Mental Health" OR Misuse OR Prevent OR Promote OR Psychological OR Report OR Sleep OR Studies OR Study OR Suicide OR Wellbeing OR Wellness)	2,224	2,224	3,503	
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Custodian - All Custodians

Report run on

December 18,
2024 3:47 pm

Daily auto-refresh

Category	Count
All results	1,211,113
Documents with hits	593,046
Family members	618,067

<div>3,963,108</div> <div>in Searchable Set + Attachments</div>	<div>Searchable Set</div> <div>Prior Search: (Custodian has any value grouped by attachments)</div>
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Search term document hits

Search	Documents with hits	Documents exclusive to search	Documents with hits (including attachment family members)	

<p>("social media" OR "social network" OR Meta OR Facebook OR Instagram OR "Insta" OR Youtube OR Snapchat OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest OR Tumblr OR viber OR threema OR wechat OR kik OR textplus OR wickr OR YikYak OR "Yik Yak" OR finsta OR FB OR IG OR YT OR TT OR DM* OR "direct message") (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR "gen-a*" OR student* OR pupil*)~150</p>	85,318	30,708	475,254	
<p>("wellness OR wellbeing OR "well-being" OR confidence OR "self-confidence" OR "mental health" OR "TMH" OR anx* OR "anti-anxi*" OR depress* OR antidepress* OR reclus* OR "attention deficit" OR "ADHD" OR posttraumatic OR "bi-polar" OR "bi polar" OR bipolar OR "BPD" OR "insomnia therap*" OR counsel*) (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR "gen-a*" OR student* OR pupil*)~150</p>	189,210	46,914	753,649	

<p>("pro-ana" OR "BMI" OR obes* OR anorexi* OR bulimi* OR orthorexi* OR dysmorph* OR binge OR purge OR suicid* OR "self harm" OR "self-harm" OR selfharm OR unalive OR cutting*) (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR "gen-a*" OR student* OR pupil*)"~150</p>	25,260	2,773	250,728	
<p>("bully* OR bullie* OR cyberbull* OR harass* OR sextort* OR transphob* OR homophob* OR racis* OR sexis* OR groom* OR hookup* OR solicit* OR pedophil* OR predator* OR extort OR exploit*) (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR "gen-a*" OR student* OR pupil*)"~150</p>	56,337	8,024	434,621	
<p>("violen* OR abus* OR assault* OR shoot* OR shot OR threat* OR gun* OR pistol OR rifle OR firearm OR rape* OR murder* OR traff* OR hate*) (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR "gen-a*" OR student* OR pupil*)"~150</p>	69,776	8,404	378,528	

<p>"(addic* OR hook* OR dopamine OR rabbithol* OR spiral OR "social reward" OR "social approval" OR "screen time" OR screentime OR staytime OR timespent OR "time spent" OR "engagement" OR impression* OR "monthly active users" OR "daily active users" OR "monthly active people" OR "daily active people" OR "weekly active users" OR "mandatory break" OR "limiting tool" OR "habit loop" OR "operant conditioning" OR "impulse control") (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR "gen-a*" OR student* OR pupil*)"~150</p>	143,585	43,013	619,802	
<p>"("eat* (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*)"~3) (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR "gen-a*" OR student* OR pupil*)"~150</p>	2,124	96	6,746	

<p>"("sleep* (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*)~3) (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR "gen-a*" OR student* OR pupil*)~150</p>	481	16	1,188	
<p>"("negative (appearance OR experience OR affect* OR effect*)~3) (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR "gen-a*" OR student* OR pupil*)~150</p>	2,197	96	77,297	
<p>"("compar* (appearance OR social OR other* OR negative)"~5) (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR "gen-a*" OR student* OR pupil*)~150</p>	8,791	981	148,425	

<p>("body (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*)"~3) (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR "gen-a*" OR student* OR pupil*)"~150</p>	403	30	1,510	
<p>("self (esteem OR harm OR control OR injur* OR mutilat* OR regulat*)"~3) (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR "gen-a*" OR student* OR pupil*)"~150</p>	8,556	366	72,348	
<p>("Covid* OR coronavirus OR pandemic OR lockdown OR "lock* down" OR quarantine OR "social* distanc*") (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR "gen-a*" OR student* OR pupil*)"~150</p>	152,532	44,733	591,629	

"(svap* OR "ecig" OR "e-cig" OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent* OR opio* OR opia* OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller* OR narcotic* OR drug* OR alcohol* OR Juul) (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR "gen-a*" OR student* OR pupil*)"~150	37,395	4,759	242,394	
"ACE" OR "ACEs" OR "adverse childhood experience" OR "adverse childhood experiences"	9,669	2,358	136,823	

"(legislation OR advocacy OR lobby* OR legislat* OR revok* OR fine* OR sanction* OR cancel* OR abandon* OR ban OR banned OR banning OR concern* OR problematic OR investigat* OR criminal OR charges OR conviction* OR arrest* OR "law enforcement" OR deceptive OR decei* OR fraud* OR defraud* OR cheat* OR misrepresent* OR mislead* OR schem* OR exploit* OR trick* OR conceal* OR hide OR omit* OR downplay* OR suppress* OR "cover up" OR "Consumer Protection Act" OR "consumer protection") (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR "gen-a*" OR scholar* OR School* OR student* OR pupil* OR grade*)"~25

308,489

141,417

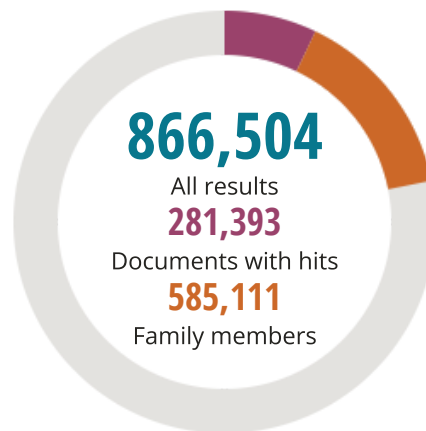
912,179

All Custodians - Revised Proximity Operator

Report run on

December 20, 2024 9:32 am

Daily auto-refresh

**3,963,108**

in Searchable Set + Attachments

Searchable Set

Prior Search: (Custodian has any value grouped by attachments)

Search term document hits

Search	Documents with hits	Documents exclusive to search	Documents with hits (including attachment family members)	
"("social media" OR "social network" OR Meta OR Facebook OR Instagram OR "Insta" OR Youtube OR Snapchat OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest OR Tumblr OR viber OR threema OR wechat OR kik OR textplus OR wickr OR YikYak OR "Yik Yak" OR finsta OR FB OR IG OR YT OR TT OR DM* OR "direct message") (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR "gen-a*" OR student* OR pupil*)~5	8,993	3,322	126,430	

<p>"(wellness OR wellbeing OR "well-being" OR confidence OR "self-confidence" OR "mental health" OR "TMH" OR anxi* OR "anti-anxi*" OR depress* OR antidepress* OR reclus* OR "attention deficit" OR "ADHD" OR posttraumatic OR "bi-polar" OR "bi polar" OR bipolar OR "BPD" OR "insomnia therap*" OR counsel*) (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR "gen-a*" OR student* OR pupil*)~5</p>	101,086	46,140	567,025	
<p>"("pro-ana" OR "BMI" OR obes* OR anorexi* OR bulimi* OR orthorexi* OR dysmorph* OR binge OR purge OR suicid* OR "self harm" OR "self-harm" OR selfharm OR unalive OR cutting*) (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR "gen-a*" OR student* OR pupil*)~5</p>	8,767	1,386	109,553	
<p>"(bully* OR bullie* OR cyberbull* OR harass* OR sextort* OR transphob* OR homophob* OR racis* OR sexis* OR groom* OR hookup* OR solicit* OR pedophil* OR predator* OR extort OR exploit*) (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR "gen-a*" OR student* OR pupil*)~5</p>	18,757	3,325	270,076	
<p>"(violen* OR abus* OR assault* OR shoot* OR shot OR threat* OR gun* OR pistol OR rifle OR firearm OR rape* OR murder* OR traff* OR hate*) (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR "gen-a*" OR student* OR pupil*)~5</p>	24,306	4,970	191,773	

<p>"(addic* OR hook* OR dopamine OR rabbithol* OR spiral OR "social reward" OR "social approval" OR "screen time" OR screentime OR staytime OR timespent OR "time spent" OR "engagement" OR impression* OR "monthly active users" OR "daily active users" OR "monthly active people" OR "daily active people" OR "weekly active users" OR "mandatory break" OR "limiting tool" OR "habit loop" OR "operant conditioning" OR "impulse control") (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR "gen-a*" OR student* OR pupil*)~5</p>	53,871	24,100	456,633	
<p>"("eat* (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*)~3) (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR "gen-a*" OR student* OR pupil*)~5</p>	243	20	720	
<p>"("sleep* (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*)~3) (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR "gen-a*" OR student* OR pupil*)~5</p>	74	3	195	
<p>"("negative (appearance OR experience OR affect* OR effect*)~3) (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR "gen-a*" OR student* OR pupil*)~5</p>	680	84	2,488	

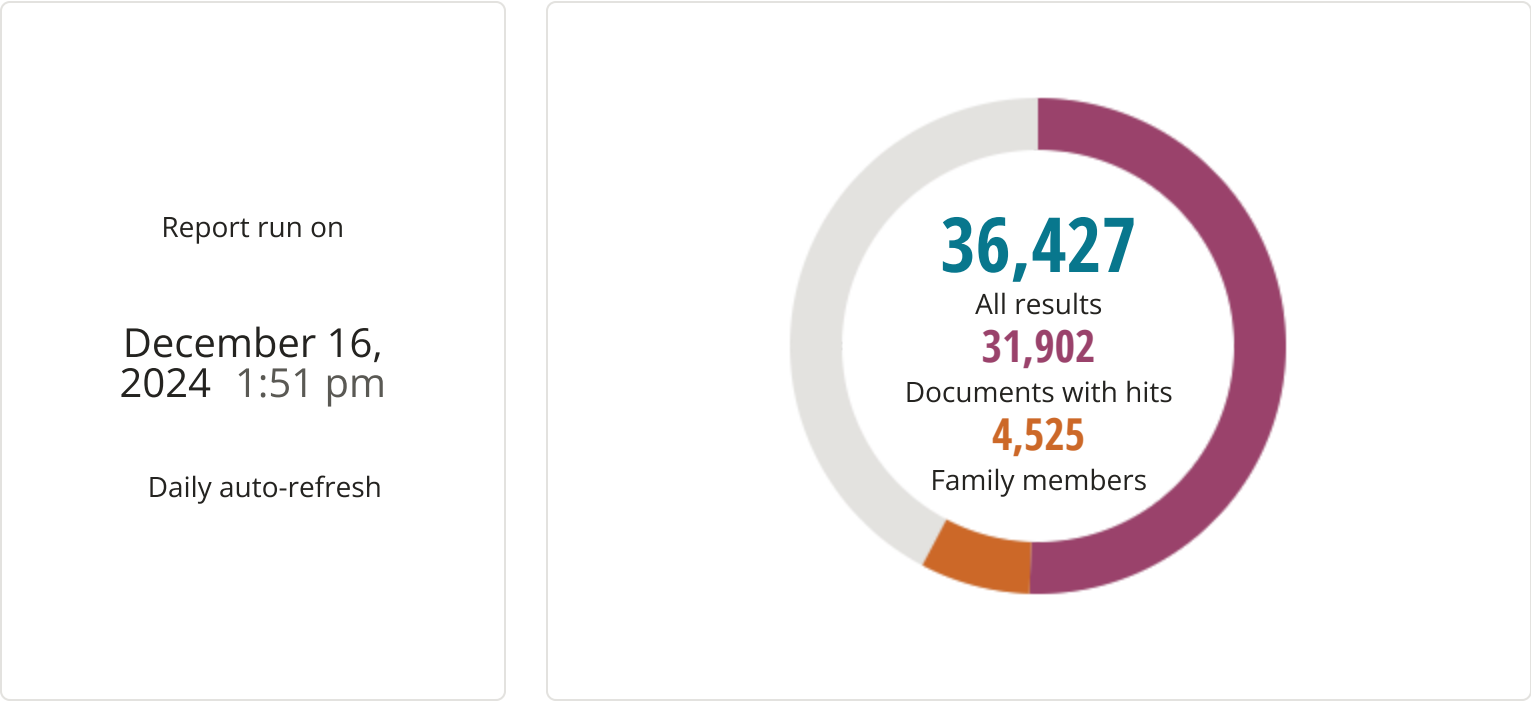
"("compar* (appearance OR social OR other* OR negative)"~5) (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR "gen-a*" OR student* OR pupil*)"~5	3,050	717	95,560	
"("body (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*)"~3) (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR "gen-a*" OR student* OR pupil*)"~5	97	11	482	
"("self (esteem OR harm OR control OR injur* OR mutilat* OR regulat*)"~3) (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR "gen-a*" OR student* OR pupil*)"~5	3,646	239	47,015	
"(Covid* OR coronavirus OR pandemic OR lockdown OR "lock* down" OR quarantine OR "social* distanc*") (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR "gen-a*" OR student* OR pupil*)"~5	49,737	22,203	425,338	

"(svap* OR "ecig" OR "e-cig" OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent* OR opio* OR opia* OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller* OR narcotic* OR drug* OR alcohol* OR Juul) (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR "gen-a*" OR student* OR pupil*)~5	11,076	2,124	41,744	
"ACE" OR "ACEs" OR "adverse childhood experience" OR "adverse childhood experiences"	9,669	4,191	136,823	
"(legislation OR advocacy OR lobby* OR legislat* OR revok* OR fine* OR sanction* OR cancel* OR abandon* OR ban OR banned OR banning OR concern* OR problematic OR investigat* OR criminal OR charges OR conviction* OR arrest* OR "law enforcement" OR deceptive OR decei* OR fraud* OR defraud* OR cheat* OR misrepresent* OR mislead* OR schem* OR exploit* OR trick* OR conceal* OR hide OR omit* OR downplay* OR suppress* OR "cover up" OR "Consumer Protection Act" OR "consumer protection") (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR "gen-a*" OR scholar* OR School* OR student* OR pupil* OR grade*)~5	135,690	84,625	641,189	

Exhibit 10C

Hit Reports

Meta Terms



<div><div>63,108</div><div>in Searchable Set + Attachments</div><div>98%</div><div>64,232 in project</div></div>	<div><div>Searchable Set</div><div>Dataset Diane Neal PST and All Date Fields from 2012/01/01 to 2024/12/13 (CST)</div></div>
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Search term document hits

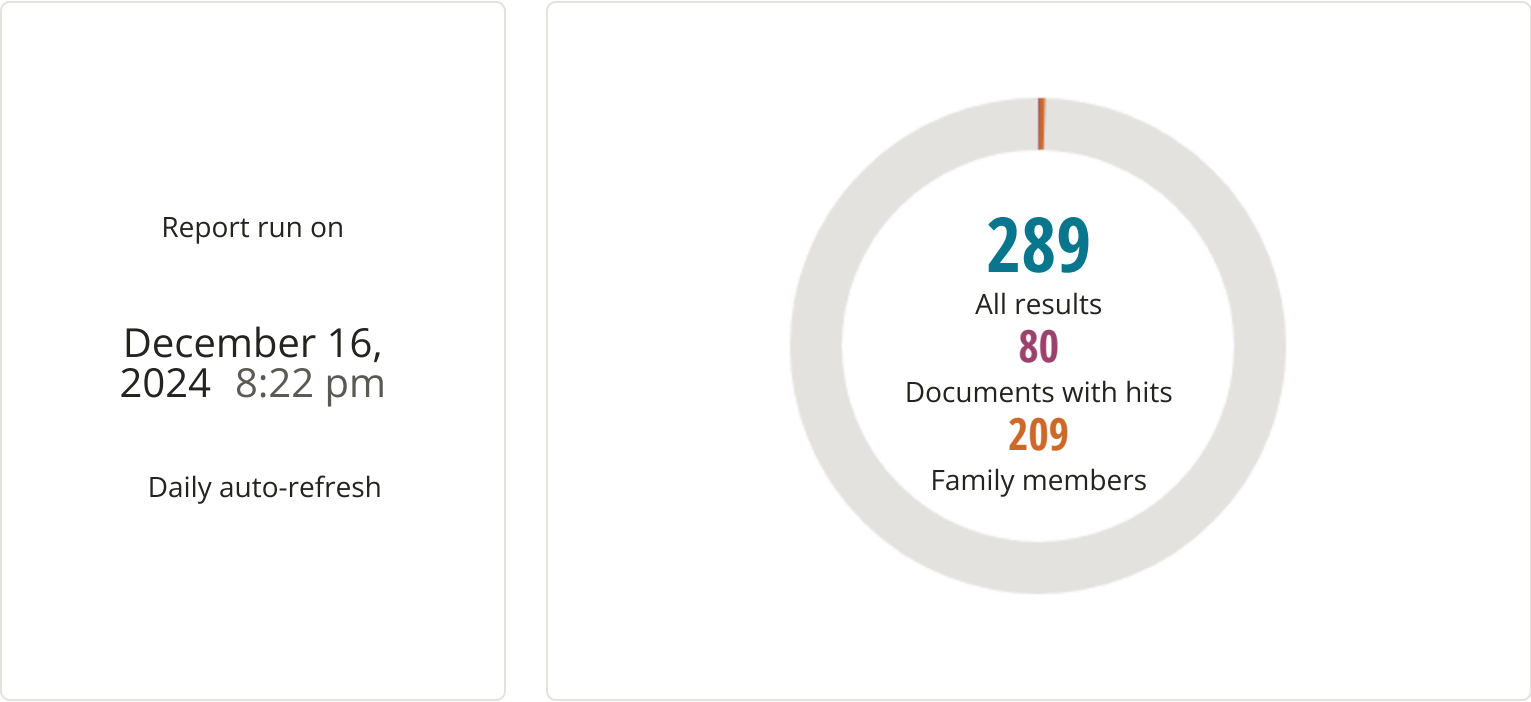
Search	Documents with hits	Documents exclusive to search	Documents with hits (including attachment family members)	

("social media" OR "social network" OR Meta OR Facebook OR Instagram OR "Insta" OR Youtube OR Snapchat OR Snap OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest OR Tumblr OR telegram OR signal OR viber OR threema OR wechat OR kik OR textplus OR wickr OR troop OR YikYak OR "Yik Yak" OR finsta OR FB OR IG OR YT OR TT OR DM* OR "direct message")	1,861	199	5,035	
(wellness OR wellbeing OR well-being OR confidence OR self-confidence OR "mental health" OR "TMH" OR "ACE*" OR "adverse childhood experience" OR anxi* OR anti-anxi* OR depress* OR antidepress* OR sad* OR reclus* OR stress OR "attention deficit" OR "ADHD" OR posttraumatic OR "bi-polar" OR "bi polar" OR bipolar OR "BPD" OR insomnia OR scar* OR afraid OR angry OR mad OR worr* OR lonel* OR alone OR therap* OR counsel* OR treatment*)	28,420	12,275	33,064	
("pro-ana" OR "BMI" OR overweight OR fat OR obes* OR diet* OR anorexi* OR bulimi* OR orthorexi* OR appetite OR dysmorph* OR binge OR purge OR suicid* OR "self harm" OR "self-harm" OR selfharm OR unalive OR cutting*)	1,573	54	3,280	
(bully* OR bullie* OR cyberbull* OR harass* OR sextort* OR transphob* OR homophob* OR racis* OR sexis* OR groom* OR hookup* OR solicit* OR pedophil* OR predator* OR sex* OR extort OR exploit*)	2,009	69	5,392	

(violen* OR abus* OR assault* OR fight* OR altercation OR misbehav* OR misconduct* OR shoot* OR shot OR threat* OR gun* OR pistol OR rifle OR firearm OR rape* OR murder* OR traff* OR hate*)	3,963	309	7,997	
(addic* OR hook* OR dopamine OR rabbithol* OR spiral OR "social reward" OR "social approval" OR "screen time" OR screentime staytime OR timespent OR "time spent" OR "engagement" OR impression* OR "monthly active users" OR "daily active users" OR "monthly active people" OR "daily active people" OR "weekly active users" OR "mandatory break" OR "limiting tool" OR "habit loop" OR "operant conditioning" OR "impulse control")	3,609	212	7,967	
("eat* (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*)"~3)	185	2	381	
("sleep* (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*)"~3)	74	0	168	
("negative (appearance OR experience OR affect* OR effect*)"~3)	95	0	1,423	
("compar* (appearance OR social OR other* OR negative)"~5)	318	11	716	
("body (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*)"~3)	8	0	18	
("self (esteem OR harm OR control OR injur* OR mutilat* OR regulat*)"~3)	311	0	728	

(Covid* OR coronavirus OR pandemic OR lockdown OR "lock* down" OR quarantine OR "social* distanc*")	2,219	370	4,956	
(svap* OR "ecig" OR "e-cig" OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent* OR opio* OR opia* OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller* OR narcotic* OR drug* OR alcohol* OR Juul)	2,777	141	6,378	
(practice* OR presentation OR assembl* OR initiative* OR interven* OR prevent* OR limit* OR control* OR legislation OR advocacy OR lobby* OR legislat* OR law OR suspend* OR revok* OR fine* OR sanction* OR cancel* OR abandon* OR ban OR banned OR banning OR concern* OR problematic OR investigat* OR criminal OR charges OR conviction* OR arrest* OR "law enforcement" OR deceptive OR decei* OR fraud* OR defraud* OR cheat* OR misrepresent* OR mislead* OR schem* OR exploit* OR trick* OR conceal* OR hide OR omit* OR downplay* OR suppress* OR "cover up" OR "Consumer Protection Act" OR "consumer protection") AND (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR gen-a* OR scholar* OR School* OR student* OR pupil* OR grade*)	14,808	1,472	20,222	

Untitled



<div>64,232</div> <div>in Searchable Set + Attachments</div> <div>100%</div> <div>64,232 in project</div>	<div>Searchable Set</div> <div>All documents</div>
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Search term document hits

Search	Documents with hits	Documents exclusive to search	Documents with hits (including attachment family members)	

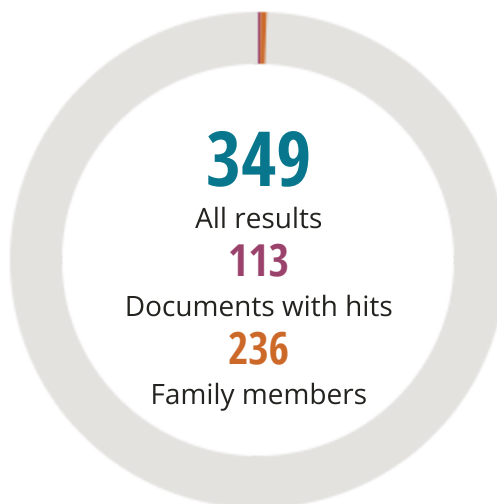
("Department of Human Services")
 AND ("Social Media" Facebook
 Instagram Meta "video game*"
 "cell phone*" "mobile phone*"
 "smart phone*" "text message*"
 messaging electronic* COVID-19
 "remote learning" drugs alcohol*
 "opioid*" "fentanyl" poverty
 homelessness "health insurance"
 "food insecurity" "physical health"
 nutrition exercise "weight
 management" "Sexual activity"
 "death in the family" "domestic
 abuse" "academic pressure" "gun
 violence" "school violence" "mass
 shooting*" bully* "verbal abuse"
 politics "political polarization"
 "natural disaster*" "climate
 change" "racial discrimination"
 "sex discrimination" "gender
 discrimination" "religious
 discrimination" "global warfare"
 "global conflict") (Abuse Addiction
 Anxiety Compulsive Depression
 Effects Harm "Mental Health"
 Misuse Prevent Promote
 Psychological Report Sleep Suicide
 trauma Wellbeing Wellness)
 (teen* tween* adolescen* kid*
 youth* minor* young* child*
 underage* "under-age" juvenile*
 "pre-teen*" U18 "under 18" U13
 "gen* z" "gen-z" "gen* alpha"
 "gen-a" scholar* school* student*
 pupil* grade*) (research
 investigation* study studies
 report reports* evaluation*
 analysis analyses program*
 initiative* effort* policies
 policy)"~10

80

80

289

Daily auto-refresh



63,227
in Searchable Set + Attachments

98%

64,232 in project

Searchable Set

Custodian exactly «Diane Neal»

Search term document hits

Search	Documents with hits	Documents exclusive to search	Documents with hits (including attachment family members)

("Department of Human Services")
 AND "("("Social Media" Facebook
 Instagram Meta "video game*"
 "cell phone*" "mobile phone*"
 "smart phone*" "text message*"
 messaging electronic* COVID-19
 "remote learning" drugs alcohol*
 "opioid*" "fentanyl" poverty
 homelessness "health insurance"
 "food insecurity" "physical health"
 nutrition exercise "weight
 management" "Sexual activity"
 "death in the family" "domestic
 abuse" "academic pressure" "gun
 violence" "school violence" "mass
 shooting*" bully* "verbal abuse"
 politics "political polarization"
 "natural disaster*" "climate
 change" "racial discrimination"
 "sex discrimination" "gender
 discrimination" "religious
 discrimination" "global warfare"
 "global conflict") (Abuse Addiction
 Anxiety Compulsive Depression
 Effects Harm "Mental Health"
 Misuse Prevent Promote
 Psychological Report Sleep Suicide
 trauma Wellbeing Wellness)"~10)
 (teen* tween* adolescen* kid*
 youth* minor* young* child*
 underage* "under-age" juvenile*
 "pre-teen*" U18 "under 18" U13
 "gen* z" "gen-z" "gen* alpha"
 "gen-a" scholar* school* student*
 pupil* grade*)"~10) (research
 investigation* study studies
 report reports* evaluation*
 analysis analyses program*
 initiative* effort* policies
 policy)"~10

113

113

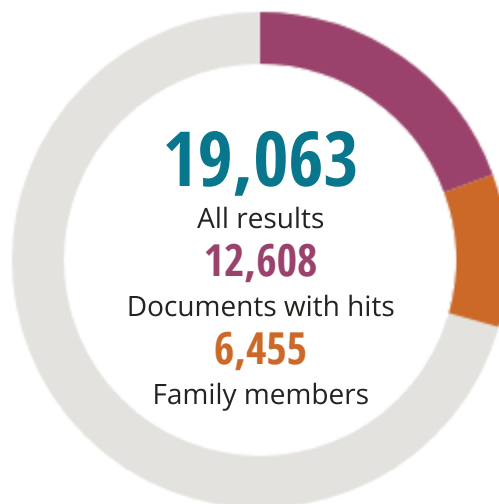
349

12.18.2024 - Meta Proposal (revised from 11.22 proposal) (Diane Neal)

Report run on

December 20,
2024 10:19 am

Daily auto-refresh



64,971
in Searchable Set + Attachments

2%

2,332,713 in project

Searchable Set

Custodian exactly «Diane Neal»

Search term document hits

Search	Documents with hits	Documents exclusive to search	Documents with hits (including attachment family members)

<p>"(teen* tween* adolescen* kid* youth* minor* young* child* underage* "under-age" juvenile* "pre-teen*" reteen* "U18" "under 18" "U13" "under 13" "gen* z" "gen-z" "gen* alpha" gen-a* student* pupil*) ("social media" "social network" Meta Facebook Instagram "Insta" Youtube Snapchat Bytedance TikTok Twitter Tweet Roblox Discord Twitch Netflix Reddit Pinterest Tumblr viber threema wechat kik textplus wickr YikYak "Yik Yak" finsta FB IG YT TT DM* "direct message")"~150</p>	755	57	1,746	
<p>"(teen* tween* adolescen* kid* youth* minor* young* child* underage* "under-age" juvenile* "pre-teen*" reteen* "U18" "under 18" "U13" "under 13" "gen* z" "gen-z" "gen* alpha" gen-a* student* pupil*) (wellness wellbeing well-being confidence self-confidence "mental health" "TMH" anxi* anti-anxi* depress* antidepress* reclus* "attention deficit" "ADHD" posttraumatic "bi-polar" "bi polar" bipolar "BPD" insomnia therap* counsel*)"~150</p>	11,155	5,456	17,133	
<p>"(teen* tween* adolescen* kid* youth* minor* young* child* underage* "under-age" juvenile* "pre-teen*" reteen* "U18" "under 18" "U13" "under 13" "gen* z" "gen-z" "gen* alpha" gen-a* student* pupil*) ("pro-ana" "BMI" obes* anorexi* bulimi* orthorexi* dysmorph* binge purge suicid* "self harm" "self-harm" selfharm unalive cutting*)"~150</p>	894	12	2,130	

<p>"(teen* tween* adolescen* kid* youth* minor* young* child* underage* "under-age" juvenile* "pre-teen*" reteen* "U18" "under 18" "U13" "under 13" "gen* z" "gen-z" "gen* alpha" gen-a* student* pupil*) (bully* bullie* cyberbull* harass* sextort* transphob* homophob* racis* sexis* groom* hookup* solicit* pedophil* predator* extort exploit*)"~150</p>	671	18	4,180	
<p>"(teen* tween* adolescen* kid* youth* minor* young* child* underage* "under-age" juvenile* "pre-teen*" reteen* "U18" "under 18" "U13" "under 13" "gen* z" "gen-z" "gen* alpha" gen-a* student* pupil*) (violen* abus* assault* shoot* shot threat* gun* pistol rifle firearm rape* murder* traff* hate*)"~150</p>	1,811	78	6,305	
<p>"(teen* tween* adolescen* kid* youth* minor* young* child* underage* "under-age" juvenile* "pre-teen*" reteen* "U18" "under 18" "U13" "under 13" "gen* z" "gen-z" "gen* alpha" gen-a* student* pupil*)(addic* hook* dopamine rabbithol* spiral "social reward" "social approval" "screen time" screentime staytime timespent "time spent" "engagement" impression* "monthly active users" "daily active users" "monthly active people" "daily active people" "weekly active users" "mandatory break" "limiting tool" "habit loop" "operant conditioning" "impulse control*)"~150</p>	1,960	57	6,654	

<p>"(teen* tween* adolescen* kid* youth* minor* young* child* underage* "under-age" juvenile* "pre-teen*" reteen* "U18" "under 18" "U13" "under 13" "gen* z" "gen-z" "gen* alpha" gen-a* student* pupil*) ("eat (problem* issue* trouble* difficult* disorder* disab* agitat* behav* insufficient depriv*)" ~3)"~150</p>	0	0	0	
<p>"(teen* tween* adolescen* kid* youth* minor* young* child* underage* "under-age" juvenile* "pre-teen*" reteen* "U18" "under 18" "U13" "under 13" "gen* z" "gen-z" "gen* alpha" gen-a* student* pupil*) ("sleep (problem* issue* trouble* difficult* disorder* disab* agitat* behav* insufficient depriv*)" ~3)"~150</p>	52	0	126	
<p>"(teen* tween* adolescen* kid* youth* minor* young* child* underage* "under-age" juvenile* "pre-teen*" reteen* "U18" "under 18" "U13" "under 13" "gen* z" "gen-z" "gen* alpha" gen-a* student* pupil*) ("negative (appearance experience affect* effect*)" ~3)"~150</p>	58	0	171	
<p>"(teen* tween* adolescen* kid* youth* minor* young* child* underage* "under-age" juvenile* "pre-teen*" reteen* "U18" "under 18" "U13" "under 13" "gen* z" "gen-z" "gen* alpha" gen-a* student* pupil*) ("compar* (appearance social other* negative)"~5)"~150</p>	144	2	457	

"(teen* tween* adolescen* kid* youth* minor* young* child* underage* "under-age" juvenile* "pre-teen*" reteen* "U18" "under 18" "U13" "under 13" "gen* z" "gen-z" "gen* alpha" gen-a* student* pupil*) ("body (accept* dissatisfaction positiv* image dysmorph*)"~3)"~150	3	0	8	
"(teen* tween* adolescen* kid* youth* minor* young* child* underage* "under-age" juvenile* "pre-teen*" reteen* "U18" "under 18" "U13" "under 13" "gen* z" "gen-z" "gen* alpha" gen-a* student* pupil*) ("self (esteem harm control injur* mutilat* regulat*)"~3)"~150	192	2	513	
"(teen* tween* adolescen* kid* youth* minor* young* child* underage* "under-age" juvenile* "pre-teen*" reteen* "U18" "under 18" "U13" "under 13" "gen* z" "gen-z" "gen* alpha" gen-a* student* pupil*) (Covid* coronavirus pandemic lockdown "lock* down" quarantine "social* distanc*"~3)"~150	815	64	1,856	
"(teen* tween* adolescen* kid* youth* minor* young* child* underage* "under-age" juvenile* "pre-teen*" reteen* "U18" "under 18" "U13" "under 13" "gen* z" "gen-z" "gen* alpha" gen-a* student* pupil*) (svap* "ecig" "e-cig" cig* smok* nicotine tobacco pot cannabis marijuana heroin crack cocaine fent* opio* opia* meth methamphetamine oxy oxycontin painkiller* narcotic* drug* alcohol* Juul)"~150	1,606	76	6,068	
"ACE" OR "ACEs" OR "adverse childhood experience" OR "adverse childhood experiences"	323	7	832	

"(teen* tween* adolescen* kid* youth* minor* young* child* underage* "under-age" juvenile* "pre-teen*" preteen* "U18" "under 18" "U13" "under 13" "gen* z" "gen-z" "gen* alpha" gen-a* scholar* School* student* pupil* grade*) (legislation advocacy lobby* legislat* revok* fine* sanction* cancel* abandon* ban banned banning concern* problematic investigat* criminal charges conviction* arrest* "law enforcement" deceptive decei* fraud* defraud* cheat* misrepresent* mislead* schem* exploit* trick* conceal* hide omit* downplay* suppress* "cover up" "Consumer Protection Act" "consumer protection")"~25

4,487

827

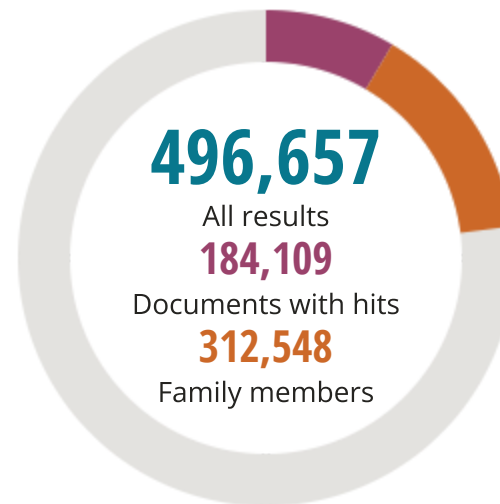
10,029

12.18.2024 - Meta Proposal (revised from 11.22 proposal) (Full collection))

Report run on

December 20, 2024 10:07 am

Daily auto-refresh



2,163,452
in Searchable Set + Attachments
100%
2,163,452 in project

Searchable Set
All documents

Search term document hits

Search	Documents with hits	Documents exclusive to search	Documents with hits (including attachment family members)	
"(teen* tween* adolescen* kid* youth* minor* young* child* underage* "under-age" juvenile* "pre-teen*" reteen* "U18" "under 18" "U13" "under 13" "gen* z" "gen-z" "gen* alpha" gen-a* student* pupil*) ("social media" "social network" Meta Facebook Instagram "Insta" Youtube Snapchat Bytedance TikTok Twitter Tweet Roblox Discord Twitch Netflix Reddit Pinterest Tumblr viber threema wechat kik textplus wickr YikYak "Yik Yak" finsta FB IG YT TT DM* "direct message")"~150	17,709	5,074	90,514	
"(teen* tween* adolescen* kid* youth* minor* young* child* underage* "under-age" juvenile* "pre-teen*" reteen* "U18" "under 18" "U13" "under 13" "gen* z" "gen-z" "gen* alpha" gen-a* student* pupil*) (wellness wellbeing well-being confidence self-confidence "mental health" "TMH" anxi* anti-anxi* depress* antidepress* reclus* "attention deficit" "ADHD" posttraumatic "bi-polar" "bi polar" bipolar "BPD" insomnia therap* counsel*)"~150	108,725	30,738	390,987	
"(teen* tween* adolescen* kid* youth* minor* young* child* underage* "under-age" juvenile* "pre-teen*" reteen* "U18" "under 18" "U13" "under 13" "gen* z" "gen-z" "gen* alpha" gen-a* student* pupil*) ("pro-ana" "BMI" obes* anorexi* bulimi* orthorexi* dysmorph* binge purge suicid* "self harm" "self-harm" selfharm unalive cutting*)"~150	22,713	494	225,730	

<p>"(teen* tween* adolescen* kid* youth* minor* young* child* underage* "under-age" juvenile* "pre-teen*" reteen* "U18" "under 18" "U13" "under 13" "gen* z" "gen-z" "gen* alpha" gen-a* student* pupil*) (bully* bullie* cyberbull* harass* sextort* transphob* homophob* racis* sexis* groom* hookup* solicit* pedophil* predator* extort exploit*)"~150</p>	18,574	1,313	237,701	
<p>"(teen* tween* adolescen* kid* youth* minor* young* child* underage* "under-age" juvenile* "pre-teen*" reteen* "U18" "under 18" "U13" "under 13" "gen* z" "gen-z" "gen* alpha" gen-a* student* pupil*) (violen* abus* assault* shoot* shot threat* gun* pistol rifle firearm rape* murder* traff* hate*)"~150</p>	69,944	7,092	331,298	
<p>"(teen* tween* adolescen* kid* youth* minor* young* child* underage* "under-age" juvenile* "pre-teen*" reteen* "U18" "under 18" "U13" "under 13" "gen* z" "gen-z" "gen* alpha" gen-a* student* pupil*)(addic* hook* dopamine rabbithol* spiral "social reward" "social approval" "screen time" screentime staytime timespent "time spent" "engagement" impression* "monthly active users" "daily active users" "monthly active people" "daily active people" "weekly active users" "mandatory break" "limiting tool" "habit loop" "operant conditioning" "impulse control*)"~150</p>	35,264	5,354	271,707	

<p>"(teen* tween* adolescen* kid* youth* minor* young* child* underage* "under-age" juvenile* "pre-teen*" reteen* "U18" "under 18" "U13" "under 13" "gen* z" "gen-z" "gen* alpha" gen-a* student* pupil*) ("eat (problem* issue* trouble* difficult* disorder* disab* agitat* behav* insufficient depriv*)" ~3)"~150</p>	54	4	223	
<p>"(teen* tween* adolescen* kid* youth* minor* young* child* underage* "under-age" juvenile* "pre-teen*" reteen* "U18" "under 18" "U13" "under 13" "gen* z" "gen-z" "gen* alpha" gen-a* student* pupil*) ("sleep (problem* issue* trouble* difficult* disorder* disab* agitat* behav* insufficient depriv*)" ~3)"~150</p>	2,071	20	6,402	
<p>"(teen* tween* adolescen* kid* youth* minor* young* child* underage* "under-age" juvenile* "pre-teen*" reteen* "U18" "under 18" "U13" "under 13" "gen* z" "gen-z" "gen* alpha" gen-a* student* pupil*) ("negative (appearance experience affect* effect*)" ~3)"~150</p>	808	16	36,063	
<p>"(teen* tween* adolescen* kid* youth* minor* young* child* underage* "under-age" juvenile* "pre-teen*" reteen* "U18" "under 18" "U13" "under 13" "gen* z" "gen-z" "gen* alpha" gen-a* student* pupil*) ("compar* (appearance social other* negative)"~5)"~150</p>	1,614	216	5,626	

"(teen* tween* adolescen* kid* youth* minor* young* child* underage* "under-age" juvenile* "pre-teen*" reteen* "U18" "under 18" "U13" "under 13" "gen* z" "gen-z" "gen* alpha" gen-a* student* pupil*) ("body (accept* dissatisfaction positiv* image dysmorph*)"~3)"~150	251	10	1,359	
"(teen* tween* adolescen* kid* youth* minor* young* child* underage* "under-age" juvenile* "pre-teen*" reteen* "U18" "under 18" "U13" "under 13" "gen* z" "gen-z" "gen* alpha" gen-a* student* pupil*) ("self (esteem harm control injur* mutilat* regulat*)"~3)"~150	8,617	173	88,060	
"(teen* tween* adolescen* kid* youth* minor* young* child* underage* "under-age" juvenile* "pre-teen*" reteen* "U18" "under 18" "U13" "under 13" "gen* z" "gen-z" "gen* alpha" gen-a* student* pupil*) (Covid* coronavirus pandemic lockdown "lock* down" quarantine "social* distanc*")"~150	27,304	4,067	89,979	
"(teen* tween* adolescen* kid* youth* minor* young* child* underage* "under-age" juvenile* "pre-teen*" reteen* "U18" "under 18" "U13" "under 13" "gen* z" "gen-z" "gen* alpha" gen-a* student* pupil*) (svap* "ecig" "e-cig" cig* smok* nicotine tobacco pot cannabis marijuana heroin crack cocaine fent* opio* opia* meth methamphetamine oxy oxycontin painkiller* narcotic* drug* alcohol* Juul)"~150	52,591	4,355	303,998	
"ACE" OR "ACEs" OR "adverse childhood experience" OR "adverse childhood experiences"	6,598	2,456	146,148	

"(teen* tween* adolescen* kid* youth* minor* young* child* underage* "under-age" juvenile* "pre-teen*" preteen* "U18" "under 18" "U13" "under 13" "gen* z" "gen-z" "gen* alpha" gen-a* scholar* School* student* pupil* grade*) (legislation advocacy lobby* legislat* revok* fine* sanction* cancel* abandon* ban banned banning concern* problematic investigat* criminal charges conviction* arrest* "law enforcement" deceptive decei* fraud* defraud* cheat* misrepresent* mislead* schem* exploit* trick* conceal* hide omit* downplay* suppress* "cover up" "Consumer Protection Act" "consumer protection")"~25

65,961

15,989

332,784